RCRA INSPECTION FORM

Report Prepared for: 1. Xloy	
Generator	<u> </u>
Transporter	<u> </u>
HWM (TSD) FACILITY	
Copy of Report Sent to the Facility	-
NAME: PROTECTS LOCAL ADDRESS: PENUS (BS P. R.	H W
1 6 8/0 6 /10 5	Zip Code 08724
POSTAL ADDRESS: FIRM DELIVERY	
PONCE P.R	Zip Code 0873 /
E.P.A. ID #: PRD09/018622	
DATE OF INSPECTION: $1/23 - 24/89$	
Participating Personnel	4 1 000
E.Q.B. or E.P.A. Personnel: PRISCILLA BRUT	RROL, COR
Peggy McGasth, Al Herrando	of CPA
Facility Personnel: Norbent Bolda	General Nonagen
KENE R. Ropleigu	87 Copplique Nous
Report Prepared by: (Name)	Noy Up
Agency: ZPA	
Telephone Number: (212) 264-178	,
Approved for the Director by:	
\)	

SUMMARY OF FINDINGS

FA	CILITY DESCRIPTION AND OPERATIONS	
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Is there reason to believe that the facility has hazardous waste on-site? a. If yes, what leads you to believe it is hazardous waste? Check appropriate boxes. Company admits that its waste is hazardous during the inspection. Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application. The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31). The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32). The material or product is listed in the regulations as a discarded commercial chemical product (§261.33). Testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report). \sqcap Company is unsure but there is reason to believe that waste materials

are hazardous. (Explain)

GENERATOR INSPECTION CHECKLIST

40 CFR 262 Subpart A - General

000 11	Sc 75D Checkbit	YES	<u>NO</u>	N/A
262.11	Hazardous waste determination			
	(a) Did the generator test its waste to determine whether it is hazardous?	_		_/
	Is the waste hazardous?		_	
	Is the generator determining that its waste exhibitis a hazardous waste characteristic(s) based on its knowledge of the material(s) or processes used?	_		
	40 CFR Subpart B - The Manifest	1		
262.20	Has hazardous waste been shipped off site since November 19, 1980?	$\sqrt{}$		y_====±
	If yes, how many shipments, off site, have been made and describe the approximate size of an average shipment made on a monthly basis. If facility is a small quantity generator, please explain.			
	Does the generator have an EPA ID #?			
		-\/-		
	Does each manifest have the following			
	information? Please circle the elements missing and obtain a copy of the incomplete manifests. (List those manifests that are deficient)			
	The second secon	_		
	The generator's name, address and phone number?		_	s
	The generator's EPA ID number?			

	YES	<u>NO</u>	N/A
The transporter(s) name, address, and phone number?			
The transporter(s) EPA ID number?	_	_	
	_	_	_
The name, address and phone number of the designated TSD facility?			
The TSDF's EPA ID number?			
The name, type and quantity of hazardous waste being'shipped, including such particulars as may be required regarding same?			
Special handling instructions and any	(
other information required on the form to be shipped by the generator?			
Before allowing the manifested waste to leave the generator's property, did the generator:		· 	-
Sign the manifest certification by hand?	_	_	
Obtain the handwritten signature of the initial transporter and date of acceptance on the manifest?			
Retain one copy and forward one copy to)———)	-
the state of origin and one copy to the state of destination?			_
Give remaining copies of the manifest form to the transporter?			
Has the generator maintained facility records for three (3) years (Manifest)s,			:
exception report(s) and waste analysis)			

	YES	<u>NO</u>	N/A
Has the generator received signed copies of portion B (from the TSD facility) of all manifests for waste shipped off site more than 35 days ago?			
If not:			
 Did the generator contact the hauler and/or the owner or operator of the TSDF and the EQB to inform the EQB of the situation, and 			
 Have exception reports been submitted to the EQB covering any of these shipments made more than 45 days ago? 			
Before transporting or offering hazardous waste for transportation off site, does the generator?	7		
Conspicuously lable appropriate manifest numbers on all hazardous waste containers that are intended for shipment?	_		
Insure that all containers used to transport nazardous waste off site are in conformance with applicable DOT regulations (i.e., 49 CFR 171)?			
Accumulation Time			
low is waste accumulated on site?			
<pre>Tanks (complete HWMF checklist)</pre>			
/// Aboveground /// Below ground	nd		
Surface impoundments (complete HWMF che	ecklist)		
<pre>Piles (complete HWMF checklist)</pre>			

	YES	<u>NO</u>	N/A
Is each container clearly dated with each period of accumulation so as to be visible for inspection?			
			_
Is waste accumulated for more than 90 days?			
TE SEE SEE SEE SEE SEE	-	_	
If yes, complete HWMF checklist.			

STOP HERE IF THE HAZARDOUS WASTE MANAGEMENT FACILITY (TSD) CHECKLIST IS FILLED OUT.

SHORT TERM ACCUMULATION STANDARDS (FOR GENERATORS WHO ACCUMULATE WASTE IN CONTAINERS FOR 90 DAYS OR LESS)

YES NO N/A

40 CFR 265 - Subpart I

265.170 Containers

What type of containers are used for storage. Describe the size, type and quantity and nature of waste (e.g., 12 fifty five gallon drums of waste acetone).

Do the containers appear to be in good condition, not in danger of leaking? If no, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific. Are all containers securely closed except those in use? Do containers appear to be properly handled or stored in a manner which will minimize the risk of the container rupturing or leaking? Are containerized hazardous waste segregated in storage by waste type? Is every container arranged so that its identification lable is visible? Is the storage area inspected at least weekly? Are containers holding ignitible and reactive waste located at least 50 feet (15 meters) from the facility's property line?

YES NO N/A 40 CFR 265 Subpart J 265.190 Tanks Does the generator store hazardous waste in tanks? If yes, what are the approximate number and size of tanks containing hazardous waste? Identify the waste treated/stored in each tank. 265.192 General Operating Requirements Are the tanks maintained so that there is no evidence of past, present, or risk of future leaks? If no, please explain. Are there leaking tanks? Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger or ruptures, corrosion, leaks or other failures? Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure? If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank, e.g., bypass system to a standby tank?

		YES	NO	N/A
265.194	Inspections			
	Is the tank(s) inspected each operating day for:			
	1. Discharge control equipment			
	2. Monitoring equipment		5. 	
	Level of waste in tank			_
	4. Construction of materials of the tank	_		
	5. Are there tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures?		_	*
	Are there underground tanks used to store hazardous waste?	_	_	
	If yes, how many and can they be entered for inspection?	_		_
	Are ignitible or reactive wastes stored in a manner which protects them from a source of ignition or reaction?			· <u></u>
	If no, please explain.			
	Does it appear that incompatible wastes are being stored separate from each other?		_	
265.16	Personnel training			
	Have facility personnel successfully completed a program of classroom instruction or on-the-job training since six months after the date of their employment or assignment to the facility or to a new position at the facility?			

	YES	<u>NO</u>	N/A
Is the program directed by a person trained in hazardous waste management procedures and does it include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed?			
If yes, have facility personnel taken part in an annual review of the initial training?			
Is there written documentation of the	-		_
following:			
Job title for each position at the			
facility related to hazardous waste management, and the name of the			
employee filling each job?			
A written job description for each position related to hazardous waste management?	,		
\	**	-	
A written description of the type and amount of both introductory and continuing training that has been and			
will be given to personnel in jobs			
related to hazardous waste management?		-	
Documentation of actual training or experience received by personnel?	3 2		
Are training records kept on all current employees until closure of the facility and training records kept on former employees for three years from their last date of			
employment?			

		YES	<u>NO</u>	N/A
	40 CFR 265 - Subpart C			
265.32	Preparedness and prevention			
	Does the facility comply with preparedness and prevention requirements including maintaining:			
	An internal communications or alarm system?			
	A telephone or other device to summon emergency assistance from local authorities?			-
		-	-	
	Portable fire equipment, spill control equipment, and decontamination equipment?			
	Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic			
	sprinklers, or water spray systems?	-		
	Is equipment tested and maintained?			_
	Is there immediate access to communications or alarm systems during handling of hazardous waste?			
	Adequate aicle coses to allow the		_	_
	Adequate aisle space to allow unobstructed movement of personnel fire protection equipment, spill control equipment and decontamination equipment?			
	If no, please explain.			
	In your opinion, do the types of waste on site require all of the above procedures, or are some not required?			
	Explain.		()	

		YES	<u>NO</u>	N/A
	Has the facility made the following arrangements, as appropriate for the type of waste handled on site?			
	Familiarize police, fire departments and emergency response teams with the layout of the facility and hazardous waste handled?			
	Where more than one police and fire department might respond to an emergency, is there an agreement designating primary emergency authority to a specific police or fire department, and agreements with any others to provide support to the primary emergency authority?	_	_	22
	Agreements with emergency response		-	_
	contractors, and equipment suppliers?			-
v	Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or discharges at the facility?	_	_	_
	40 CFR Subpart D			
	Contingency plan and emergency procedures			
	Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions, hazards to human health or environment, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water?	_		

265.50

	YES	<u>NO</u>	N/A
Are provisions of the plan carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?			
Does the contingency plan describe the actions facility personnel shall take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility?			
Did the owner or operator prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 or Part 1510?	_		
If yes, did the owner or operator amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this section?			
Does the plan describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services?			
Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and is this list kept up to date? Where more than one person is listed, one shall be named as primary emergency coordinator and others shall be listed in the order in which they will assume responsibility as alternates.			

YES NO N/A Does the plan include a list of all emergency equipment at the facility (such as fire extinguising systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required? Is the list kept up-to-date? In addition. does the plan include the location and a physical description of each item on the list, and a brief outline of its capabilities? Does the plan include an evacuation procedure for facility personnel where there is a possibility that evacuation could be necessary? Does this plan describe signal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires)? Is a copy of the contingency plan and

all revisions to the plan:

- Maintained at the facility; and
- Has the contingency plan been submitted to local authorities (police, fire departments, emergency response teams)?

TRANSPORTER INSPECTION

40 CFR Part 263 - Transporter Standards

	TO OTR PATE 203 - Transporter Standards			
		YES	<u>NO</u>	N/A
263.10	Does the transporter carry hazardous waste? If yes, explain.	_	_	
	Does the transporter store hazardous waste at a transfer facility - if yes, how long?			
	10 days or less			: #5
	more than 10 days (complete TSD form)			
	Has the transporter obtained a hazardous waste collector/hauler license from the EQB? License #:	-	_	_
	Does the transporter have an EPA identification number?	_	_	_
	Does the transporter have in each registered vehicle a current list of all federal and state agencies to be notified in the event of a discharge of hazardous waste during			
	transportation? How many vehicles were inspected?			_

-13-			
	YES	<u>NO</u>	N/A
Have the drivers received any			
instruction or training to do with	/		
the handling of hazardous waste?		_	
Has the transporter ever had an			
unauthorized discharge of hazardous			
waste during transportation?			0
If yes, did the transporter:			
Give notice, if required by 49 CFR			
171.15 to the National Response Center?			
Barrier Francisco			1
Report in writing as required by 49 CFR			
171.16 to the Director, Office of			*
Hazardous Materials, Transportation Bureau, Department of Transportation.			
Washington, DC 20590?			

		.i	1		
		YES	NO	N/A	
	MANIFESTS				
263.20	Does the transporter have a manifest form to accompany the waste shipment?	_	-	-	
	Does a representative portion of the manifests show the following information (if not, circle the missing information).				
	 Generator's name, address, telehphone, and EPA ID number, signature and date of signature. 				
	 Transporter's name, EPA ID number, signature and date of signature. 	-		-	
	* TSDF's name, address and EPA ID number	(1)		_	
	and either the signature and date of the TSDF or the name, EPA ID, signature and date of the next transporter.				
	 Manifest Document Number 				
	 Proper DOT shipping description 				
	 Quantity and type of containers 	=	2,	_	
	(If no, to any of the above obtain copies of incomplete manifests).				
	Based on available information, do all manifests conform to the hazardous waste shipments made? If no, explain.	% 			
	<i>¥</i>				
	<i>/</i>				
	Has the transporter maintained facility records for three (3) years?				

	/		
	YES	<u>NO</u>	N/A
If the shipment originated from a site in Puerto Rico and is destined for another site in Puerto Rico, is the manifest form one supplied by the EQB?	_		
If the shipment originated from a site in Puerto Rico and is destined for a TSDF in another state, is the manifest form one supplied by EQB or one approved for use by the Department?			-
If the hauler was unable to deliver a manifested load to the designated facility, did they contact the generator and gain further instructions from them?	_		10
If yes, cite generator name and manifest			

If yes, cite generator name and manifest number involved.

HAZARDOUS WASTE FACILITY STANDARDS

40 CFR Part 265 Subpart B - General Facility Standards

265.13	Waste Analysis	YES	<u>NO</u>	N/A
	Is there a detailed chemical and physical analysis of a representative sample of the waste(s) or each waste? (At a minimum, this analysis must contain all the information necessary for proper treatment, storage or disposal of the waste).		1	
	Does the character of the waste handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? Check only one: Waste characteristics vary All waste(s) are basically the same Company treats all waste(s) as hazardous	<u>/</u>		_
	Is there a written waste analysis plan at the facility?	$\sqrt{}$	7	
	Does it contain:			
	Parameters for which each hazardous waste stream will be analyzed and the rational for the selection of these parameters?		_	
	The test methods which will be used to test for these parameters?	1	y	
	The sampling method which will be used to obtain a representative sample of the waste to be anlayzed?			
The only on the water of	Listing garameter Gerform. Linchnik load and ptf. flow intert, coanide & sulfield	The form	Proce.	Second

	YES	<u>NO</u>	N/A
The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date?			_
For off-site facilities, the waste analysis that hazardous waste generators have agreed to supply?	<u>/</u>		
Procedures which will be used to identify changes in waste stream characteristics?			_
Did the owner or operator submit the waste analysis plan to the department?			_
If yes, when was the plan submitted?			
Does hazardous waste come to this facility from an outside source (e.g., another generator)?		_	
If yes, list the name(s) of generators. See attachmit 44 (ushilit 44			
If waste comes from an outside source, are there procedures in the waste analysis plan to insure that waste received conforms to the accompanying manifest?		-	u g e
Does the plan describe:			
The procedures which will be used to determine the identity of each shipment of waste managed at the facility?			.
The sampling method which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling?			

YES NO N/A 265.14 Security Does the facility have: A 24 hour surveillance system which continuously monitors and controls entry onto the active portion of the facility? An artificial or natural barrier, which completely surrounds the active portion of the facility; and a means to control entry, at all times, through the gates or other entrances to the active portion of the facility? Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility? If no, explain what measures are taken for security.

		YES	<u>NO</u>	N/A
265.15	General Inspection Requirements			
	Does the owner or operator inspect the facility for malfunctions and deterioration, operator errors and discharges which may be causing, or may lead to:			
	Discharge of hazardous waste constituents to the environment?		1	
	A threat to human health?		· 	-
	Has the owner or operator developed, and does the owner or operator follow a written schedule for inspecting monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that are utilized for the prevention, detection or response to the environmental or human health?	<u> </u>		_
	Is the written inspection schedule kept at the facility?		_	
	Does the schedule identify the types of problems to be looked for during the inspection?			
	Does the schedule include the frequency of inspection, based upon the rate of possible deterioration of the equipment and the probability of an environmental, or human health incident if the deterioration or malfunctions or any operator error goes undetected between inspections?	1	_	_
	Is there evidence that problems reported in the inspection log have been remedied?	1		
	Does the owner/operator record inspections in a log?	_		_
	Are these records kept for at least three (3) years from the date of inspection?	,) (

265.16

	YES	NO	N/A	
Does the records include the date, and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial action?				
Personnel training				
Have facility personnel successfully completed a program of classroom instruction or on-the-job training within six (6) months of having been employed?				
- P - 3	Rina 18/4 5. Dan Robinson		digas Les de exter inter	gas Jaco Sh Jaco Sh Jater J Heat L
If yes, have facility personnel taken part in an annual review of training? Last annual review of training? Is there written documentation of the following:		_	hes a	1 RCRA
Job title for each position at the facility related to hazardous waste managment, and the name of the employee filling each job?	_	_		
A written job description for each position related to hazardous waste management?	1			
A written description of the type and amount of both introductory and continuing training given to personnel in jobs related to hazardous waste management?	1			
Documentation of actual training or experience received by personnel?		X		
no documentation of actual fram)			

	YES	<u>NO</u>	N/A
Are training records kept on all current employees until closure of the facility and training records kept on former employees for 3 years from their last date of employment?	_/		_
Preparedness and prevention			
Does the facility comply with preparedness and prevention requirements including maintaining:			
An internal communications or alarm system?	_/	_	_
A telephone or other device to summon emergency assistance from local authorities?	J		
Portable fire equipment, spill control equipment, and decontamin-ation equipment?	/		
Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems?			
Is equipment tested and maintained?			
Is there immediate access to communi- cations or alarm systems during handling of hazardous waste?	1		
Adequate aisle space to allow unobstructed movement of personnel fire protection equipment, spill control equipment and decontamination equipment?	_	_	
If no, please explain.	(3	0	

	YES	<u>NO</u>	N/A
In your opinion, do the types of waste on site require all of the above procedures, or are some not required?	1		_
Explain.			
Has the facility made the following arrangements, as appropriate for the type of waste handled on site?			
Familiarize police, fire departments and emergency response teams with the layout of the facility and hazardous waste handled?	/		_
Where more than one police and fire department might respond to an emergency, is there an agreement designating primary emergency authority to a specific police or fire department, and agreements with any others to provide support to the primary emergency authority?			
Agreements with emergency response contractors, and equipment suppliers?	1		_
Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or discharges at the facility?		_	

		YES	NO	N/A
265.50	Contingency plan and emergency procedures			
	Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions, hazards to human health or environment, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water?		_	
	Are provisions of the plan carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?	1	1 #2 1 - 0	
	Does the contingency plan describe the actions facility personnel shall take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility?			
	Did the owner or operator prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 or Part 1510?			17 <u>22-2</u> 1
	If yes, did the owner or operator amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this section?			g 1
	Does the plan describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services?	_/		:

YES NO N/A

Does the plan list names, addresses, and phone number (office and home) of all persons qualified to act as emergency coordinator and is this list kept up-to-date? Where more than one person is listed, one shall be named as primary emergency coordinator and others shall assume responsibility as alternates.

Does the plan include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required? Is the list kept up-to-date? In addition, does the plan include the location and a physical description of each item on the list, and a brief outline of its capabilities?

Does the plan include an evacuation procedure for facility personnel where there is a possibility that evacuation could be necessary? Does this plan describe signal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires)?

Is a copy of the contingency plan and all revisions to the plan:

- 1. Maintained at the facility; and
- 2. Has the contingency plan been submitted to local authorities (police, fire departments, emergency response teams)?

Derete With new-

<u>_____</u>

_ _ _

		YES NO N/A
265.112	Closure plan	
	Does the facility have a written closure plan?	
	Does the owner/operator keep a written copy of the closure plan and all revisins to the plan at the facility?	
	If yes, does the plan include:	Chame Clan for
	A description of how and when the facility will be partially closed (if applicable) and ultimately closed?	Closene Clan for each of i surflate winter i surflate
	The maximum extent of the operation which will be unclosed during the life of the facility?	
	An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the life of the facility?	
	A description of the steps needed to decontaminate facility equipment during closure?	
	A schedule for final closure including the anticipated date when the wastes will no longer be received, the date when completion of final closure is anticipated, and intervening milestone dates which will allow tracking of the progress of closure?	
265.118	Post Closure Plan	
	Does the facility have a written post- closure plan kept at the facility?	
		i also unde
		i also unde

reinen

	7.		
	YES	<u>NO</u>	N/A
If yes, does the plan:			
Identify the activities which will be carried on after closure and the frequency of these activities?			
Include a description of the planned groundwater monitoring activities and frequencies at which they will be performed?			
Include a description of the planned maintenance activities, and frequency at which they will be performed, to insure the following:			183
The integrity of the cap and final cover or other containment structures where applicable?		_	
Describe the function of the facility monitoring equipment?			
Include the name, address and phone number of a person or office to contact about the disposal facility during the post-closure period?	_	_	_
Does the owner/operator have a written estimate of the cost of post-closure for the facility?		_	
If ves. what is it?			

Please circle all appropriate activities and answer questions on indicated pages for all activities circled.

Storage	Treatments	Disposal
Container - pg. 5	Tank - pg. 30	Landfill - pg. 39
Tank, above ground - pg. 6	Surface Impoundments - pg. 35	Surface Impoundments - pg. 35
Tank, below ground - pg. 6	Incineration - pg. 42	Other
Surface Impoundments - pg. 35	Thermal Treatment - pg. 45	
Waste Piles - pg. 37	Chemical, Physical and Biological Treatment - pg. 45	
Other	Other	

YES NO N/A

40 CFR 265 Subpart 1

Containers

What type of containers are used for storage? Describe the size, type, quantity and nature of wastes (e.g., 12 fifty-five gallon drums of waste acetone).

They bere to great. But drums (IT feel earle)

Street at the Storage area. A frather beingst ground and a fantament system for spills, leaks and precipitation?

If yes, describe the containment system.

This are appeared to great for spills, great great

Do the containers appear to be of sturdy leakproof construction of adequate wall thickness, weld, hinge and seam strength, and of sufficient material strength to withstand side and bottom shock, while filled, without impairment of the container's ability to contain hazardous waste?

If no, explain.

Are the lids, caps, hinges or other closure devices of sufficient strength that when closed, they will withstand dropping, overturning or other shock without impairment of the container's ability to contain hazardous waste?	_	 ·—
If no, explain.		
· ·		
Do the containers appear to be in good condition, not in danger of leaking?	\perp	
If not, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.		
Are all containers securely closed, except those in use, so that there is no escape of hazardous waste or its vapors?	1	 _
If no, explain.		
Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking?	_/	
If no, explain.		

YES NO

N/A

	YES	<u>NO</u>	N/A
Are containerized hazardous wastes segregated in storage by waste type?	_	$\sqrt{}$	_
Are containerzied hazardous wastes arranged so that their identification label is visible?	1		
Are hazardous wastes stored in containers made of compatible materials?	_	_	
Does the owner/operator inspect the container storage area at least weekly, looking for leaks and for deterioration caused by corrosion or other factors?	1	_	
Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line?		_	
Are incompatible wastes, or incompatible wastes and materials placed in the same container?			_
If yes, explain.			

Are hazardous wastes place in unwashed containers that previously held incompatible wastes?

The drum of caiding material ever found in a Storage being containing of the drum material ever found in a Storage being to containing of the drums in the west of a less. On gen 40 CPR Part 265 appearation I - Examples of Potentially Incompetible Waste, Strong and in material the segregated from solvents. This quarties on the production of Storage of appropriately from solvents in a surface plable managent proceeding of therefore is a violation of 40 CPR 265. 127.

Are containers holding hazardous waste that are incompatible with any waste or other materials stored nearby in other containers, open tanks, or surface impoundments separated from other materials or protected from them by means of a dike, berm, wall or other device?

Are ignitable, reactive or incompatible wastes protected from sources of ignition or reaction?

If no, explain.

Does the owner/operator confine smoking and open flames to specially designated locations when ignitable or reactive wastes are being handled?

If no, explain.

Does the owner/operator conspicuously place "No Smoking" signs whenever there is a hazard from ignitable or reactive waste?

If the treatment, storage or disposal of ignitable or reactive waste, and the mixture of incompatible wastes and materials, conducted so that it does not:

Generate extreme heat or pressure, fire or explosion, or violent reaction?

YES NO N/A

Lu notion gagers

_ _ _ _

Su note on Jag. 28

	YES	NO	N/A
Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health?		_	
Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk or fire or explosion?			
Damage the structural integrity of the device or facility containing the waste?			
Threaten human health or the environment?	_	7	_
40 CFR 265 Subpart J			
Tanks			
What are the approximate number and size of tanks containing hazardous wastes?	C. M.		2
Story of lindans. Joseph.		0	1

Identify the waste treated/stored in each tank.

lindan

	YES	<u>NO</u>	N/A
General Operating Requirements			
Are hazardous wastes or treatment reagents placed in the tank that could cause the tank or its inner liner to rupture, leak or corrode?			_
If yes, please explain.			
<i>!</i>			
Are there leaking tanks?	N <u></u>		
Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger or ruptures,			-
corrosion, leaks or other failures?		-	1
Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?			_
If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank, e.g., bypass system to a standby tank?	5		1
Inspections			
Is the tank(s) inspected for:			
 Discharge control equipment (each operating day) 			
 Monitoring equipment (each operating day) 	J		
Level of waste in tank (each operating day)	1		
4. Construction of materials of			

Are there underground tanks used to store hazardous wastes? If yes, how many and can they be entered for inspection?		<u>YES</u>	<u>NO</u>	<u>N/A</u>
Has the underground tank been in use on or before November 19, 1980? Specify date.				_
If no, when was the tank placed in use?				
Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction? If no, please explain.	•			_/
Does it appear that incomptabile wastes are being stored separate from each other?		12 	87 	-

40 CFR 265.90 Subpart F

265.90 Groundwater monitoring

(Applies only to: surface impoundments, landfills, land disposal facilities)

Does the owner/operator have a groundwater monitoring plan capable of determining the facility's impact on the quality of groundwater?

If no, please explain.

How many monitoring wells has the facility installed?

What is the depth to groundwater?

How many deep monitoring wells are on-site? (Indicate depth of monitoring wells)

How many shallow monitoring wells are on-site? (Indicate depth of monitoring wells)

YES NO N/A

Subpart ar reguerent ar Ande nevren

	YES	<u>NO</u>	N/A
Is the groundwater monitoring system capable of yielding groundwater samples for analysis? If no, please explain.	-	, c	_
Are monitoring wells installed hydraulically upgradient? If yes, specify how many and the depth of each.			
How many monitoring wells are installed hydraulically down gradient? If yes, specify how many and the depth of each.	8		_
Does the owner/operator have a groundwater sampling and analysis plan?	_	_	_

1 2 3	es the plan include procedures and chniques for: 1. Sample collection 2. Sample preservation and shipment 3. Analytical procedures 4. Chain of custody	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Desifeat to p (e.g syst	the heintralization simply her class of the state since the contraction of layour the the approximate size of layour	1/8/ 11/8/	1) /45 /	e e
Do al cover integ	nere at least two feet of freeboard ne impoundment? I earthen dikes have a protective to preserve their structural prity? es, please specify the type of covering.			_

	YES	<u>NO</u>	N/A
Does the owner/operator have a detailed chemical and physical analysis of a representative sample of the waste in the impoundment?	/		
Does the owner/operator place the results from each waste analysis and trial test, or the documented information, in the operating record of the facility?	_/		_
Does the owner or operator inspect:	3/		_
The freeboard level at least once each operating day to insure compliance with 265.222?		_	
The surface impoundment, including dikes and vegetation surrounding the dike, at least once a week to detect any leaks, deterioration or failures in the impoundment?			
Is ignitable or reactive waste placed in the surface impoundment?			7
If yes, is the waste treated, rendered, or mixed before or immediately after placement in the impoundment?		-	
Does the resulting waste, mixture, or dissolution of material no longer meet the definition of ignitable or reactive waste?	_	_	
Is the waste treated, rendered or mixed so that it does not:	-	S	_
Generate extreme heat or pressure, fire or explosion, or violent reaction?			
Produce uncontrolled toxic mists, fumes, dusts, of gases in sufficient quantities to threaten human health?		-	
Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion?	_		
S. S	-	—	

	YES	<u>NO</u>	N/A
Damage the structural integrity of the device or facility containing the waste?			
Is the surface impoundment used soley for lagor emergencies?	elean it	Jez-	twi.
Are incompatible wastes, or incompatible wastes and materials placed in the same surface impoundment?			X
If yes, is the waste managed so that it does not:			
Generate extreme heat or pressure, fire or explosion, or violent reaction?	_		*
Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health?			
Damage the structural integrity of the device or facility containing the waste?			
Threaten human health or the environment?			_
40 CFR Subpart L			
Waste Piles How many waste piles are on-site and approximately how large are they? (Please indicate size and height types of wastes in piles.)			
Is the waste pile protected from wind erosion?			×
a) Does it appear to need such protection?			
 Explain what type of protection does exist. 			

265.250

265.253	Containment	YES	<u>NO</u>	N/A
	 Is leachate run-off from the waste piles a hazardous waste? If no, skip down to 265.256. 	/		
	Is the pile placed on an impermeable base?			
	3. Is run-on diverted away from the pile?		-	
			-	
	and treated?	 -	-	-
	If no to any of the above questions than:			
	5. Is the pile protected from precipitation and run-on?			
	6. Are waste containing free liquids placed in the pile?			
	/			
265.256	 Are ignitable or reactive wastes placed on the pile? If no, skip to 265.257. 			
	2. Is the ignitable or reactive waste added to existing pile resulting in it no longer meeting the definition of ignitable and reactive?			
	If no, please explain.		_	
	3. Is the waste protected from any materials or condition that may cause it to ignite or react?	_	_	
	If no, please explain.			

Does it appear that a pile of incompatible wastes is being stored separate from other wastes or materials, or protected from them by means of a dike, berm, wall or other devices?

If no, please explain.

265.300

40 CFR 265 Subpart N

Landfills

Identify the types of waste and size of the landfill.

General Operating Requirements

Is run-on diverted away from all portions of the landfill?

Is run-off from active portions of the landfill collected?

Is waste which is subject to wind dispersal controlled?

Please explain how.

	YES	<u>NO</u>	N/A
Are untreated, ignitable, or reactive wastes placed in the landfill? If yes, explain.	7	_	
Are incompatible wastes, or incompatible wastes and materials placed in the same hazardous waste landfill cell? If yes, explain.	_	-	æ
Are bulk or non-containerized liquid waste or waste containing free liquids placed in a hazardouswaste landfill? If yes: Does the hazardous waste landfill have a liner which is chemically and physically resistant to the added liquid and a			
functioning leachate collection and removal system with a capacity sufficient to remove all leachate produced? Before disposal, is the liquid waste or waste containing free liquids treated or stabilized, chemically or physically, so	_	_	_
that free liquids are no longer present? Are containers holding liquid waste or waste containing free liquids placed in a hazardous waste landfill?	_		_
If yes: Is the container designed to hold liquids or free liquids for a use other than storage, such as a battery?	_		

•	YES	<u>NO</u>	N/A
Is the container very small, such as an ampule?			
Are empty containers crushed flat, shredded, or similarly reduced in	_	_	_
volume before it is buried beneath the surface of a hazardous waste landfill?			
Does the owner or operator use Method 9095 (Paint Filter Liquids Test) to demonstrate the absence or presence of free liquids in		_	
either a containerized or a bulk waste?			13
Does the owner or operator of a hazardous waste landfill maintain an operating record regired in 265.73?			
Does the owner/operator maintain a map, the exact location and dimensions, including depth of each cell with respect to permanently surveyed bench marks?			
The contents of each cell and the appropriate location of each hazardous waste type within each cell?	_	-	2
Are containers holding liquid waste or waste containing free liquids place in the landfill?			
Please describe the types and contents of such containers placed in the landfill.			_
V			

Are empty containers placed in the landfill crushed falt, shredded or similarly reduced in volume before they are buried?

YES NO N/A

Are small containers of hazardous waste in overpacked drums placed in the landfill?

If yes, please describe precautions taken to prevent the release of the waste.

40 CFR 265 Subpart O

265.340 <u>Incinerator</u>

What type of incinerator is at the site (e.g., waterwall incinerator, boiler, fluidized bed, etc.).

List the types and quantities of hazardous waste incinerated.

Is the residue from the incinerator a hazardous waste?

What types of air pollution control devices (if any) are installed in the incinerator unit?

Is energy recovered from the process?

If yes, describe.

	YES	NO	N/A
What is the destruction and removal efficiency for the organic hazardous waste constituents?			
	1		
Does the operating record include additional analysis and to determine types of pollutants which might be emitted including:			
Heating value of the waste?	·	n <u></u> 5	
Halogen and sulfur content?			
Concentrations of lead and emergency?			
If no to any of the above questions, is there justification and documentation?		_	
If operating, does it appear the incinerator is operating at steady state for conditions of operation, including temperature and air flow?	-	_	
Monitoring and Inspection			
Are existing instruments relating to combustion and emission controls monitored every 15 minutes?			
If no explain			

		40	
Does the incinerator have all the	YES	<u>NO</u>	N/A
following instruments for measuring: wastefeed, auxiliary fuel feed air flow, incinerator temperature scrubber flow, and scrubber pH? (Circle missing instruments.)			
If no, explain.			
: /			
Is the stack plume observed visually at least hourly for opacity and color?			ă
Are there any signs of leaks, spill and fugitive emission associated with the pumps, valves, conveyors, pipes, etc?			s ————————————————————————————————————
If yes, describe.			
Are all emergency shutdown controls and system alarms checked to assure proper operation?			
Is there any reason to believe the incinerator is being operated improperly? i.e., steady state condition are not maintained.			5770
If yes, explain.			-

Is the incinerator inspected daily?	YES	<u>NO</u>	N/A
Is there open burning of hazardous waste?			_
If yes, what is being burned? (Only burning or detonation of explosives is permitted.)		_	_

If open burning or detonation of explosives is taking place, approximately what is the distance from the open burning or detonation to the property of others?

40 CFR 265 Subpart P

265.370

Chemical, Physical and Biological Treatment

(Other than in tanks, surface impoundments or plant treatment facilities)

Describe the treatment system at this facility and the types of wastes treated.

	YES	<u>NO</u>	N/A
Does the treatment process system show any signs of ruptures, leaks or corrosion?			
If yes, describe.			
Is there a means to stop the inflow of continuously-fed hazardous wastes?	_	_	1
Inspections			
Is the discharge control safety equipment (e.g., waste feed cut-off systems, by-pass systems, drainage systems and pressure relief systems) in good working and pressure			
relief systems) in good working order?			
Are they inspected at least once each operation day?			
Does the data gathered from the monitoring equipment (e.g., pressure and temperature gauges) show treatment process is operating according to design?			
Is data gathered at least once each		*	_
operating day?	-	D==	
Are construction materials of the treatment process inspected at least weekly to detect corrosion or leaking of fixtures and seams?	S 		9-6
re the discharge confinement structures (e.g., dikes) immediately surrounding the reatment unit inspected at least weekly to detect erosion or obvious signs of eakage (e.g., wet spots or dead			
egetation)?			

	YES	<u>NO</u>	N/A
Are ignitable or reactive waste fed into the waste treatment system treated or protected from any material or conditions which may cause it to ignite or react?			
If yes, explain how.		_	
Are the incompatible wastes placed in the same treatment process?			
If yes, please explain.	·		

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Ro			
U.S. EPA I.D. No.:	PRD0910	18622	
A comment of the comm			
C'.	State:		
Telephone:			
Street:		· ·	
Telephone:			200-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0
_			
<u>~:</u>			
Telephone:			
Inspection Date:/_		Weather Cond	ditions:
Name	Affili		Telephone
Inspectors:			
	<u> </u>		
Facility Representatives	s:		*
		•	
	RCRA Status	F-Solvent LI	OR Status California List
Generator			0
Transporter		1	
Treater			
Storer			
Disposer	*		

RCRA LAND DISPOSAL RESTRICTION INSPECTION APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

				Gen.	Treat	Store	Disp.	Trans.
A.	F-S	olvent Was	tes			1		
	1.	F001				$\sqrt{}$		
	2.	F002						
	3.	F003			-			
	4.	F004						
	5.	F005						
		Note:	Use Appendix misclassifying	A to deter	rmine when	her the fac	cility is	

B. California List Wastes

 Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

	Gen.	Treat	C	ъ.	V
	Gen.	reat	Store	Disp.	Trans.
Arsenic	500 mg/L			0	
Cadmium	100 mg/L	77	11		
Chromium VI	500 mg/L	12			
Lead	500 mg/L	×	√		-
Mercury	20 mg/L		7	X=====	3. 3
			7	-	
Nickel	134 mg/L	_	1		-
Selenium	100 mg/L		1		
Thallium	130 mg/L				
	. 50 mg/L				

2.	Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L
	Gen. Treat Store Disp. Trans.
3.	Liquid hazardous waste that has a pH of less than or equal to 2.0
4.	Liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 ppm Refero agented del frame 500 ppm in wathant History process
	Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes? Yes No NA
	If yes, state reasons for mixing:
5.	Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L
	Note: The prohibitions of 268.32(a)(3) and (e) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

•	BD	AT Treatability Group - Treatment Standards Identification			
 F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste? 					
		Yes No NA			
		If yes, check the appropriate treatability group.			
		Wastewaters containing solvents (less than or equal to 1% TOC by weight) Pharmaceutical wastewater containing spent methylene chloride All other spent solvent wastes			
	2.	California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?			
		a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?			
		Yes No NA			
		If yes, specify the method:			
		b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?			
		Yes No NA			
		If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:			

B.	Waste	Ana	vsis

2.

a.	Does the generator determine whether the F-solvent waste exceeds treatment standards?
	Yes No NA
	How was this determination made?
	- Knowledge of waste
	YesNo
	If yes, note how this is adequate:
	- TCLP Yes No
	If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.
	Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?
	Yes No NA
	If yes, specify the waste stream:
	Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?
	Yes No NA
	How does the generator test F-solvent waste when a process or waste stream changes?
alif	ornia List Wastes
	Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?
	·····•

b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?				
	Yes No NA			
	What type of absorbent is used? Check the types of waste to which absorbent is added.			
	Liquid hazardous waste having a pH less than or equal to 2			
	Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L			
	Liquid hazardous waste containing metals			
	Liquid hazardous waste containing free cyanides			
c.	Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:			
	- Knowledge of wastes			
	Yes No NA			
	If yes, note how this is adequate:			
	- Testing Yes No NA			
	If yes, list test method used:			
i.	Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?			
	Yes No NA			
	- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels:			
•	Does the generator dilute the waste as a substitute for adequate treatment [268.3]?			
	Yes No NA			

Mai	nagement					
1.	On-Site Management					
	Is waste that exceeds the treatment standards treated, stored, or disposed on-site?					
	Yes No					
	If yes, the TSD Checklist must be completed.					
2.	Off-Site Management					
	a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?					
	Yes No					
	If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?					
	Yes No					
	If yes, does notification contain the following?					
	EPA Hazardous waste number(s) Yes No					
	Applicable treatment standards Yes No					
	Manifest number Yes No					
	Waste analysis data, if available Yes No					
	Identify off-site treatment or storage facilities:					
9	b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?					
	Yes No					
	If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?					
	Yes No					

C.

		If yes, does notification contain the follo	owing?	
		EPA Hazardous waste number(s)	Yes	No
		Applicable treatment standards	Yes	No
		Manifest number	Yes	No
		Waste analysis data, if available	Yes	No
		Certification that the waste meets treatment standards	Yes	No
		Identify off-site land disposal facilities:		
	c.	If the waste is subject to a nationwide va (e.g., solvent-water mixtures less than 1%) (268.5), or petition (268.6), does the general provide notification to the off-site dispose that the waste is exempt from land dispose restrictions [268.7(a)(3)]?	, extension ator al facility	
		Yes No	N	A
D.	(1.0., 00116)	t Using RCRA 264/265 Exempt Units or Pr rs, furnaces, distillation units, wastewater t tanks, elementary neutralization, etc.)	<u>ocesses</u>	
	Are unde	treatment residuals generated from units of RCRA 264/265?	r processes exer	mpt
		YesNo		
	If ye	s, list types of waste treatment units and p	rocesses:	
	(

RCRA LAND DISPOSAL RESTRICTION INSPECTION TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

A.	Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?
	Yes No
	If yes, check the appropriate regulatory status: Interim status for storage RCRA permit for storage If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:
B.	Does the transporter mix, combine, or recontainerize wastes?
	Yes No
C.	Is the waste treated in an exempt treatment process on-site?
	Yes No

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A.

Ge	General Facility Standards			
1.	Do	Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?		
	0	F-solvent Yes No NA		
	0	California List Yes No NA		
2.	Do wa	es the facility obtain representative chemical and physical analyses of stes and residues?		
		Yes No		
	a.	What date was the waste analysis plan last revised?		
	b.	Are analyses conducted on-site or off-site?		
		Identify off-site lab: BO Fal-		
	c.	Is F-solvent waste analyzed using TCLP?		
		Yes No NA		
	d.	Describe the frequency of sampling: long chipsen		
	c.	Describe procedures used to identify manifest discrepancies:		
3.	com	the operating records, including analyses and quantities, plete [264.73/265.73]?		
		Yes No		

B.	Sto	rage (268.50)
	1.	Are restricted wastes stored on-site?
		Yes No
		If no, go to C, Treatment
	2.	If yes, check the appropriate method.
		Tanks Containers
	3.	Are all containers clearly marked to identify the contents and date(s) entering storage?
	*	Date plening Storage area reliable in
	4.	Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage? Yes No
	5.	Do operating records agree with container labeling? Yes No NA
	6.	Have wastes been stored for more than I year since the applicable LDR regulations went into effect?
		Yes No NA
		If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?
		Yes No
		If yes, state how:

/.	regulations went into effect?
	Yes NoNA
	If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?
	Yes No
8.	Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?
	Yes No NA
C. <u>Tre</u> 1.	Does the facility treet
	Does the facility treat restricted wastes other than in surface impoundments? Yes No
	If no, go to D, Treatment in Surface Impoundments.
2.	Describe the treatment processes:
3.	Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]? Yes No
4.	Describe frequency of testing treatment residuals:
5.	Is dilution used as a substitute for treatment?
	Yes No

9	6. Are notifications prepared by the generators kept in the facility's operating record?
	Yes No
7	. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?
	Yes No NA
	If yes, does the treatment facility provide notification and certification to the disposal facility?
	Yes No
	If yes, does notification contain the following?
*	EPA Hazardous waste number(s) Yes No
	Applicable treatment standards Yes No
	Manifest number Yes No
	Waste analysis data, if available Yes No
	Certification that the waste meets the treatment standards Yes No
	Identify off-site disposal facilities:
-	
<u>lre</u>	atment in Surface Impoundments
1.	Are restricted wastes placed in surface impoundments for treatment?
	YesNo
	If no, go to E, Land Disposal.
2.	If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?
	Yes No

D.

3.	If the minimum technology requirements have not been met, has a waiver been granted for that unit?	15
	Yes No	
4.	Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?	
	Yes No Attach test results.	
5.	Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41?	
	Yes No	
 6. 7. 	Provide the frequency of analyses conducted on treatment residues: Does the operating record adequately document the results of waste analyses performed in	_
	of waste analyses performed in accordance with 268.41?	
	Yes No	
8.	Are the hazardous waste residues that exceed the treatment standards (268.41) removed adequately and on an annual basis?	
	Sludge Yes No	
	Supernatant Yes No	
2	a. If no, and supernatant is determined to exceed treatment concentrations, is annual volume of liquid flowing through the impoundment greater than the impoundment volume?	
	Yes No	
t	do records indicate that liner integrity is inspected?	
	Yes No	

		c. A	are residues subsequently managed in another surface mpoundment?
			Yes No
		d. A	re residues treated prior to disposal?
			Yes No
		If	yes, are waste residues treated on-site or off-site?
			On-site Off-site
		Id	entify treatment method:
E.	La	nd Disposal	
 Are restricted wastes placed in land disposal units such as landfills, surface impoundments waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker? 			
		Note:	Yes No Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.
		If yes, sp received:	ecify which units and what wastes each unit has
	2.	Does the generator	facility operating record have notices and certifications from s/storer/treaters [268.7(c); 268.7(a),(b)]?
			Yes No
:#	3.	Does the to the was	facility obtain waste analysis data or test the wastes (according ste analysis plan) to determine that the wastes comply with the treatment standards [268.7(c)]? Yes No
		If yes, at	what frequency?
		3	

4.	If consider the second
₹.	If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?
	[208.44]?
	Yes No
5 .	Does the facility dispose of restricted wastes that are subject to a national capacity variance?
	Yes No
	If yes, are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection)?
	Yes No
6.	Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?
	Yes No NA
7.	What is the volume of the restricted wastes disposed of to date?
8.	If the facility has a case-by-case extension, is the facility making progress as described in progress reports?
	Yes No NA

APPENDIX A

SOLVENT IDENTIFICATION CHECKLIST

 Does the handler generate any of the following F00 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process in pure form or commercial grade? 		- language and the second
	tetrachloroethylene trichloroethylene methylene chloride 1,1,1-trichloroethane carbon tetrachloride chlorinated fluorocarbons	YesNoYesNoYesNoYesNoYesNoYesNoYesNo
2.	Does the handler generate any of the constituents (i.e., spent halogenated so being used in the process either in pu commercial grade?	Ivantal
	tetrachloroethylene trichloroethylene methylene chloride 1,1,1-trichloroethane chlorobenzene trichlorofluoromethane 1,1,2-trichloro-1,2,2-trifluoroethane ortho-dichlorobenzene	YesNoYesNoYesNoYesNoYesNoYesNoYesNoYesNoYesNo
3.	Does the handler generate any of the constituents (i.e., spent nonhalogenated result of being used in the process eith commercial grade?	columnas)
an an	xylene acetone ethyl acetate ethyl benzene ethyl ether methyl isobutyl ketone n-butyl alcohol cyclohexanone methanol	YesNoYesNoYesNoYesNoYesNoYesNoYesNoYesNoYesNoYesNoYesNoYesNoYesNo
	If the F003 waste stream has been mixed does the resultant mixture exhibit the incharacteristic?	ed with a solid waste, gnitabilityYesNo

4.	Does the handler generate any of t constituents (i.e., spent nonhalogeneresult of being used in the process commercial grade?	
	cresols and cresylic acid nitrobenzene	Yes No
5.	Does the handler generate any of the constituents (i.e., spent nonhalogena result of being used in the process commercial grade?	ne following F005
	toluene methyl ethyl ketone carbon disulfide isobutanol pyridine	YesNoYesNoYesNoYesNoYesNo
6.	Are any of the constituents listed in 5 used for their "solvent" properties (dissolve) or mobilize other constitue questions will be helpful in confirmi	questions 1 through that is to solubilize nts? The following ing this determination.
	(a) Are the constituents used as che If yes, list the constituents.	emical carriers?YesNo
,	(b) Are the constituents used for de If yes, list the constituents.	greasing/cleaning?YesNo
	(c) Are the constituents used as dilu-	ents? YesNo
(0	d) Are the constituents used as extra	ctants?YesNo

	If ye	s, list the constituents.
	(e)	Are the constituents used for fabric scouring?
	If yes	YesNo
	(f)	Are the constituents used as reaction and synthesis media? Yes No
	If yes,	list the constituents.
If the beling the state of the	Are an is consi	the waste may be an F-solvent, answer question 7. y of the above constituents spent solvents? (A solvent dered "spent" when it has been used and is no longer without being regenerated, reclaimed, or otherwise ssed.) YesNo
8.	questio	waste is a mixture of constituents as determined in ns 1 through 6, give the concentration before use of all the nents in the solvent mixture/blend. For example:
	5% 2% 25% 68% 100%	methylene chloride trichloroethylene 1,1,1-trichloroethane mineral spirits
	or more	(by volume) of one or more of the F001, F002, F004, listed constituents before use, it is a listed waste.
×	" aste st	spect to the F003 solvent wastes, if, before use, the ream is mixed and contains only F003 constituents, it ed waste. For example:
	33% 16% <u>51%</u> 100%	acetone methanol ethyl ether

If the waste stream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste. For example:

50%	xylene	(F003)
12%	TCE	(F001)
_38%	mineral	
100%	Destroyant C. F. C. F.	opirita

If in light of the above, the handler appears to be generating F001 - F005 hazardous wastes, refer this facility to the enforcement official for followup actions verifying the use of solvents at the facility.

APPENDIX B TREATMENT STANDARDS FOR F-SOLVENTS

F001-F005 SPENT SOLVENTS	CONCENTRA	ATION (IN MG/L)		
- DOLVENTS	WASTEWATERS	OTHER WASTE		
Acetone	0.05			
N-butyl	0.05	0.59		
Carbon disulfide	5.0	5.0		
Carbon tetrachloride	1.05	4.81		
Chlorobenzene	.05	.96		
	.15	.05		
Cresols (and cresylic acid)	2.82	.75		
Cycohexanone	.125	.75		
1,2-dichlorobenzene	.65	.125		
Ethyl acetate	.05	.75		
Ethyl benzene	.05	.053		
Ethyl ether	.05	.75		
sobutanol	5.0	5.0		
Methanol	.25	.75		
Methylene chloride	.20	.96		
Methylene chloride (from the pharmace	eutical			
industry)	12.7	.96		
Methyl ethyl ketone	0.05	0.75		
Methyl isobutyl ketone Vitrobenzene	0.05	.33		
yridine	0.66	0.125		
etrachloroethylene	· 1.12	0.33		
oluene	0.079	0.05		
1,1-Trichloroethane	1.12	0.33		
	1.05	0.41		
2,2-Trichlor 1,2,2-trifluoroethane	1.05	0.96		
cichlorofluoromethane	0.062	0.091		
vlene	0.05	0.96		
I TANK	0.05	0.15		

Wastes shipped to:

TSD NAME LOCATION EPA ID NO.

TYPE OF FACILITY T/D METHODS

WASTE CODE

WASTE QUANTITY

COMMENTS (shipment dates, waste descriptions, etc.)

Exhibit #1

Manufests Jaon Digital



COMMONWEALTH OF PUERTO RICO
Environmental ENVIRONMENTAL QUALITY BOARD

P.O. Box 11488, Santurce, Puerto Rico 00910

	se print or type. (Form designed for use on elite (12-pitch) typewriter.)						50-0039 Expires 9-30-88
68	Canaratar's ISE	A ID No. Ma	nifest	2. Page	1 Informa	tion in t	he shaded areas ed by Federal
A.	WASTE MANIFEST P.R.D. OOO	06333 Docum	0 6 6	of	2 law.		
1	3. Generator's Name and Mailing Address			A. Sta	te Manifest D	ocume	nt Number
П	Digital Equipment Corporation	V 14		1000	州湖南 计 马利特	美国12年	and the state of t
Н	P.O. Box 106 ROAD 368 Km 2			B. Sta	te Generator's	s ID	
	San Germán, Puerto Rico 00753 SABANA GRANDE	, PR 00747			te Generator		
	4. Generator's Phone (809) 892-1946				10 USB104	(ID	
1	5. Transporter 1 Company Name 6.	US EPA ID Numb	er		te Transporte		
	OPLANDO CONZALEZ INC. P. F	D.O.O.O.7.0.6	3.6.6		nsporter's Ph		33-5985
	ORI ANDO GONZALEZ INC. 7. Transporter 2 Company Name 8.	US EPA ID Numb	er	111111111111111111111111111111111111111	te Transporte		
П	TRAILER MARINE TRANSPORTER P. I	TT-0-9-0-5-5-9	3.6.0		nsporter's Ph		33-5521
	Designated Facility Name and Site Address	US EPA ID Numb	er	G. Sta	ite Facility's II	D	
П	CHEMICAL WASTE MANAGEMENT			H. Fac	ility's Phone	de rost	
	ALABAMA HIGHWAY 17 AT MILE MARKER 163				05/652-97	401-201-201	PULLBRIDGE CONTRACTOR OF STREET
	EMELLE, ALABAMA 35459 A.I	. D. 0. 0. 0. 6. 5. 5	12.Conta		13.	14.	nell Volt - Sife E
	11. US DOT Description (Including Proper Shipping Name, Hazard	d Class, and ID Number,	12.00/10	land in	Total	Unit	Waste No.
	TI. 03 DOT Description (including 1.5pt. 5.5pt. 5		· No.	Туре	Quantity	Wt/Vo	A THE STREET
3	a.						SPECIAL PROPERTY.
	RQ, HAZARDOUS WASTE, SOLID N.O.S.				0.0	X.f.	£ 006
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	b.						操作等。此题 统
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	b. Additional Information	S STATES NAME AND DESCRIPTIONS OF STREET	4 11-11				
	15. Special Handling Instructions and Additional Information						
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	TRAILER # TOLU 481-04%-6		and the second		selbad about by	nroner si	ninning name and are
	16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of classified, packed, marked, and labeled, and are in all respects in proper of government regulations. If I am a large quantity generator, I certify that I have a program in place economically practicable and that I have selected the practicable method of threat to human health and the environment; OR, if I am a small quantity waste management method that is available to me and that I can afford.	to reduce the volume and treatment, storage, or dispo generator, I have made a go	toxicity of	waste ge	nerated to the d	egree I h	nave determined to be
	Printed/Typed Name	Signature	der,	de	Sin	/	10.911.518
V	LUIS A. URETA)		
ŗ	17. Transporter 1 Acknowledgement of Receipt of Materials	Jain		-			Month Day Yea
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٥	18. Transporter 2 Acknowledgement or Receipt of Materials			1 -			Month Day Yea
RTER	Printed/Typed Name	Signature					
-	19. Discrepancy Indication Space						
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i		deus materiale sousse	by this o	nanifest	except as no	ted in	Item 19
Ĩ	20. Facility Owner or Operator: Certification of receipt of haza	ruous materiais covered	Dy tina i		The second secon	Total Str.	

Month Day

WASTE MANIFEST (Continuation Sheet) P R D 0	0 0 7 0 6 3	Manifest Document No	22.Pag	15 no	nation in the shaded are t required by Fede
23. Generator's Name DIGITAL EQUIPMENT CORPORATION RUAD 366 Km 2.4		T. M. M. M. M. M.	CV	VMA 4	
SABANA GRANDE, PR 00747 FET (809) 892-1946		IW. Stat	e Generator	S ID
24. Transporter 3 Company Name	25. US EP	A ID Number	N. Stat	e Transporte	r's ID
CHEMICAL WASTE MANAGEMENT	A L D 0 9 9 27. US EP	202681	O. Tran	sporter's Ph	one
26 Transporter Company Name	27. US EP	A ID Number		e Transporte	
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28 US DOT Description (Including Proper Shipping Name,	Hazard Class, and I	Number, 29. Cont	Type	30. Total Quantity	Unit R. Waste No.
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Discrepancy Indication Space					



P.O. Box 11488, Santurce, Puerto Rico 00910

se p	crint or type (Form designed for use on elite (12-pitch) typewriter)		Form A	pproved OMB No	2050-0	0039. Expires 9-30
	UNIFORM HAZARDOUS	Manifest Imeni No	2 Pa	is not	requir	he shaded area ed by Federa
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3	Generator's Name and Mailing Address		M. 318		dinent .	tumbe.
	DIGITAL EQUIPMENT CORPORATION			N/A		
	P.O. BOX 106 SABANA GRANDE, P.R. 00753		A 17 17 18 18	te Generator's II		
4	Generator's Phone (809) 892-1946		ALTERIOR DE	ABANA G		
5	Transporter 1 Company Name 6. US EPA ID Numb	er	C Sta	te Transporter's	19	RP-1747
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7	Transporter 2 Company Name 8 US EPA ID Numb		E. Sta	te Transporter's	10	/A
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L	6 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are full	Illy and acc	urately c	lescribed above by		1
1	proper shipping game and are classified, packed, marked, and labeled, and are in all respects in p	roper cond	ition for	transport by high	way	
	according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and	t toxicity of	waste o	enerated to the de	gree I ha	ve determined to
	future threat to human health and the environment, OR, if I am a small quantity generator, I have no the best waste management method that is available to me and that I can afford	nade a goog	C	D. To minimalize my	waste g	
+	Printed Typed Name Signature	1				Month Day
	LUIS URETA	PV.	_			1091031
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1	Printed Typed Name Signature	111				month bay
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	18 Transporter 2 Acknowledgement of Receipt of Materials	^	11			Month Day
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P.O. Box 11488. Santurce, Puerto Rico 00910

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16	GENERATOR'S CERTIFICATION: Thereby declare that the contents of proper shipping name and are classified, packed, marked, and labeled, a	if this consignment are for nd are in all respects in p	ully and accu proper condi	tion for	transport by high	vay		
	according to applicable international and national government regulation	ns					and determined to b	
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	to tore threat to human tealth and the environment, OR, if I am a small question between the management method that is available to me and that I ca	rantity generator, I have r	nade a good	faitheff	outo minimize m	y waste g	eneration and selec	
-	Printed Typed Name LUIS UREAA	Signature) -	()	X /		Month Day Y	
1	LUIS URENA		de rest	\sim	~		109101318	
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P.O. Box 11488, Santurce, Puerto Rico 00910

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ENVIRONMENTAL QUALITY BOARD

P.O. Box 11488. Santurce, Puerto Rico 00910

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3 Generator's Name and Mailing Address		illi di ti	A State M.		cument N	umber
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4 Generator's Phone (809) 892	-1946		S	ABANA	GRAN	IDE
5 Transporter 1 Company Name	6. U	S EPA ID Number	C State Tra	insporter's	10 1	9-88194
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3	Generator's Name and Mailing Address	ddress P R D0 0 07 0 63 3 3 88 24 9 A State Manufest Docume						lumber		
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4	Generator's Phone (809) 892-1	946				SABANA		RANDE		
5	Transporter 1 Company Name PROTECO	6	US EPA ID N	umber	C. Sta	te Transporter's	- 16328 -1			
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15 T E	Special Handling Instructions and Additional MPORARY STORAGE ENDE	DAT PROTE	CO 9/21/88	PICKED	UP	BYORLA	NDO G	ONZALE		
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16	GENERATOR'S CERTIFICATION: I hereby di proper shipping name and are classified, packet according to applicable international and nation	ed, marked, and labeled,	and are in all respects in	fully and accura proper condition	ately de on for tr	scribed above by ansport by highw	ay			
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COMMONWEALTH OF PUERTO RICO Environmental ENVIRONMENTAL QUALITY BOARD

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WASTE MANIFEST	00		6 3 3 3 18 8	250	of	1 law	31	
3 Generator's Name and Mailing A	Address				A Stat	e Manifest Docu	ment Nu	imber
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4 Generator's Phone I Roo I					SA	BANA GRA	NDE	1637
5 Transporter 1 Company Name		6	US EPA ID Num		D Trai	e Transporter's I		2058
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9 Designated Facility Name and S	lite Address	10.	US ETAID NO		7		N	/A
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hazardous materials covered by this manifest except as noted in Item 19



P.O. Box 11488. Santurce, Puerto Rico 00910

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19 Discrepancy Indication Space

COMMONWEALTH OF PUERTO RICO Environmental ENVIRONMENTAL QUALITY BOARD

P.O. Box 11488, Santurce, Puerto Rico 00910

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P.O. Box 11488. Santurce, Puerto Rico 00910

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Environmental ENVIRONMENTAL QUALITY BOARD

P.O. Box 11488, Santurce, Puerto Rico 00910

	UNIFORM HAZARDOUS WASTE MANIFEST	1 Generator's US EPA ID No	Manifes Document	1 2	Page 1	Informa	tion in	0039 Expires !
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ENVIRONMENTAL QUALITY BOARD

P.O. Box 11488. Santurce, Puerto Rico 00910

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3 Generator's Name and Mailing Address	1414	A State	Manifest Doc	ument N	Number
DIGITAL EQUIPMENT CORPORATION			N /A		
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4 Generator's Phone (809 & 892-1946		C A	BANA GR	A NI D	p 5
5 Transporter 1 Company Name 892-1946 6. US EPA ID Numl	ber	C State	Transporter's	10	15157-1
DROTECO	600	D. Trans	sporter's Phone	是0201号 9	-2058
7 Parsporte 2 Company Name B US EPA ID Numi	ber	E. State	Transporter's		-2038
	1 1 1	F. Tran	sporter's Phone	N/	A STATE OF THE STA
9 Designered Facility Name and Site Address 10 US EPA ID Num	ber	G. State	Facility's ID	N	/A
PROTECO				4	
Road 385, Km. 3.5		H. Facil	ity's Phone	N/	A CONTRACTOR
Peñuelas, Puerto Rico	101212	100,205	836-2058		
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11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	No	Type	Total	Unit Wt/Vol	Waste No
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b ORM-E NA 9189 PROTECO Profile Number P 2022	101210	CIMIC	010101210	1	F 006
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20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted, in Item 19



P.O. Box 11488. Santurce, Puerto Rico 00910

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P.O. Box 11488. Santurce, Puerto Rico 00910

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20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19



COMMONWEALTH OF PUERTO RICO Environmental ENVIRONMENTAL QUALITY BOARD

P.O. Box 11488, Santurce, Puerto Rico 00910

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ENVIRONMENTAL QUALITY BOARD

P.O. Box 11488. Santurce, Puerto Rico 00910

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COMMONWEALTH OF PUERTO RICO Environmental ENVIRONMENTAL QUALITY BOARD

P.O. Box 11488, Santurce, Puerto Rico 00910

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	UNIFORM HAZARDOUS WASTE MANIFEST	1 Generator's US EPA ID No B R D 0 0 0 7 0 6 3 3 3 8	Manifest Document No 8 2 6 0	2 Pag of			he shaded area ed by Federa
3	Generator's Name and Mailing Address	•	0,2,0,0	A Stat	e Manifest Doci	ument f	Number
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1	P.O. BOX 106 SABANA	GRANDE, P.R. 00753		B Stat	e Generator's II	0	
1.	Ganarators Phone 200 200 10	1.6		0	ARANACI	DANT	F
4	Generator's Phone 809 892-19 Transporter Company Name	6. US EPA ID N	umber	C Stat	ABANA G	ID -	4.0
"	Transporter & Company Stantes	0	GI CHARGE	o stat	e Transporter's	19-	15154
	PROTECO	PRD09101	8 6 2 2		sporter's Phone		2058
7	Transporter 2 Company Name	8 US EPA ID N	umber		e Transporter's	14	/A
	?	T 1 (1 1 1 1 1 1 1		F. Tran	nsporter's Phone		M / A
9	Designated Facility Name and Site Address	ss 10 US EPA ID N	lumber	G Stat	e Facility's ID		NIA
1	PROTECO			570			N/A
1	Road 385, Km. 3.5 Peñuelas, Puerto Rico			(TA141)	lity's Phone		
		P R D 0 9 1 0 1	8 6 2 2	(80	9) 836-2058		
101	US DOT Description (Including Proper Shippin	og Name, Hazard Class, and ID Number)	12 Con	tainers	13 Total	14. Unit	I. Waste No.
12.07			No	Type	Quantity	Wt/Vol	vvaste No.
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		0			Trucki	19 3	in c
16	GENERATOR'S CERTIFICATION: I hereby	declare that the contents of this consignment a	re fully and acco	urately de	scribed above by		2.7000
	proper shipping name and are classified, pack	ed, marked, and labeled, and are in all respects	in proper condi	tion for tr	ansport by highw	vay	
	according to applicable international and natio	onal government regulations I I have a program in place to reduce the volume	and toxicity of	vaste der	nerated to the dec	aree I ha	ve determined to
	economically practicable and that I have select	ted the gracticable method of treatment, storage	, or disposal cur	rently ava	allable to me whic	in minimi	izes the present a
	future threat to human health and the environ the best waste management method that is a	ment, OR , if I am a small quantity generator, I ha	ve made a good	faith effo	rt to minimize my	wastege	eneration and set
	Printed Typed Name	Signature	,		0		Month Day
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1	8 Transporter 2 Acknowledgement of Receip		, ,				Month Day
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P.O. Box 11488. Santurce, Puerto Rico 00910

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4 Gen	erator's Phone 809 892-1	946				SABANA	GRANI	O.E.
5 Iran	sporter 1 Company Name	6	US EPA ID Numb	er	C Stat	e Transporter's	ID 19-	16398-
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7 Tran	sporter 2 Company Name	8	US EPATO Numb	er	E Stat	te Transporter's	ID N/	7 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
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Peñi	uelas, Puerto Rico				190	lity's Phone 9) 836-2058		
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11 US 2	OCT Description fincluding Proper Shippin	g Name, Hazard Class, a	and ID Number)	No No	Type	Total Quantity	Unit Wt-Vol	I. Waste No.
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J Addit	tional Descriptions for Materials Listed		A PROPERTY OF STREET	75.000	K. Hand	lling Codes for W	astes Liste	ed Above
a. CO	NTAMINATED SOIL				177			
a. 50						a. S 01		c.
						b.		d.
15 Spec	ial Handling Instructions and Addition emporary storage er	al Information	TECO THE	Pick	ed up	by Orlan	do Go	n20/02
14	TEMPORARY STOR	ACE	10-24-88	Truc	tina	, Inc.		
						,		1500 No
U IS CEN	nit Trailer # STTU- ERATOR'S CERTIFICATION: I hereby of	403053-2		TD	No. P	RT00070	6366	ZUBING
prope	er shipping name and are classified, packed ding to applicable international and nation	ed, marked, and labeled,	and are in all respects in pro-	oper conditi	on for tra	ensport by highw	ay	
	a large quantity generator. I certify that							
	omically practicable and that I have selecte e threat to human health and the environn							
th∈ b	est waste management method that is av ed. Typed. Name		can afford		H-1.101 1010 - C. 200			
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	ed Typed Name	or iviaterials	Signature		-(/			Ionth Day
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18 Trans	sporter 2 Acknowledgement of Receipt	of Materials	100	- 6		-		27/1/6/18
	pd Typed Name A	0 .	Signatule,	1	1	1	M	fonth Day
51	gerido Huiles	Kod	& Justicel.	Cui	1	Lord	1/	10121418
19 Discr	epancy Indication Space	DIDGED	Fredo		V		1/	1-1-1/19
		DI CANT.						
20 Facili	ty Owner or Operator Certification of	receipt of hazardous	materials covered by this	manifest	ехсерт а	s noted in Item	19	

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COMMONWEALTH OF PUERTO RICO ENVIRONMENTAL QUALITY BOARD

P.O. Box 11488. Santurce, Puerto Rico 00910

	UNIFORM HAZARDOUS	1 Generator's US EPA ID		Manifest Document No	2 Pa			the shaded are
	WASTE MANIFEST	P. R. D. O. O. O. 7.	0.6 3 3 3 8	8 2 6 2	of	1 law		William Index
3	Generator's Name and Mailing Address				A Sta	te Manifest Doc	ument I	Number
	DIGITAL EQUIPMENT C					N/A		
	P.O. BOX 106 SABANA	GRANDE, P.R.	00753		B Sta	te Generator's II	D	
4	Generator's Phone 809 892-	10/6			0.1			
5	Transporter 1 Company Name	1940	US EPA ID N	lumber	C. Sta	te Transporter's		GRANDE
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7	Transporter 2 Company Name	IP R	D 0 9 1 0 1	8622	Section of the second	te Transporter's	0.	36-2058
	Transporter 2 Company Name	.0:	03 11 7 10 11	idilibei.			1	N/A
	Designated Facility Name and Site Addre			1_1_1_1_	1.11.11.19	nsporter's Phone	the sale	N/A
9		ess 10	US EPA ID N	lumber	G Sta	te Facility's ID		11.4.1
	PROTECO Road 385, Km. 3.5					Fred Special Co.		N/A
	Peñuelas, Puerto Rico				ANY or shade	ility's Phone		
		P R	D 0 9 1 0 1		1,1003	9) 836-2058		
11	US DCT Description (Including Proper Shippi	ing Name, Hazard Class, and	ID Number)	12 Cont	ainers	13. Total	14. Unit	I. Waste No
				No	Type	Quantity	Wt/Vo	TVBSIE NO
a	A CARDONE WASHING COL	TO N O C						
	HAZARDOUS WASTE SOL							7006
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b		*						
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a	Additional Descriptions for Materials List		ile Number	ples some in	K. Har	dling Codes for W	astes Li	sted Above
J	Company Server of Controller (Service Management of Control	ed Above	ile Number		K. Har	dling Codes for W	lastes Li	sted Above
J	Additional Descriptions for Materials List	ed Above	ile Number		K. Har	dling Codes for W	/astes Li	sted Above
J	Company Server of Controller (Service Management of Control	ed Above	ile Number		K. Har	a. S 01	astes Li	C.
J	.CONTAMINATED SOIL	ed Above			3 19	a. S 01 b.		c.
J	.CONTAMINATED SOIL	ed Above		115/83	3 19	a. S 01 b.		c.
J	Special Handling Instructions and Addition Temps rally Storage	ed Above		115/88	3 19	a. S 01 b.		c.
J a	Special Handling Instructions and Addition Temporally Storage	onal Information + Prencied at	BOTECO 10,	115/83	Pici	a. S01 b. Ked UP alex 710	By	c.
J a	Special Handling Instructions and Addition Temporally Storage	onal Information + Prencied at	BOTECO 10,	115/83	Pici	a. S01 b. Ked UP alex 710	By	c.
J. a.	Special Handling Instructions and Addition Temporally Storage TEMPORARY STORAGE UN+ +14, c+ +XT GENERATOR'S CERTIFICATION: I hereby proper shipping name and are classified, page	onal Information + Property declare that the contents of the c	BOTECO 10,	e fully and accu	Picion Sense	a. SO1 b. Led UP w/e Tro No. 000 700 escribed above by	By 40K1	c.
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J a	Special Handling Instructions and Addition Temporally Storage of TEMPORARY STORAGE UNIT TAILET #XT GENERATOR'S CERTIFICATION: I hereby proper shipping name and are classified, pad according to applicable international and nat It I am a large quantity generator. I certify the economically practicable and that I have selected.	PACE Above RU-67 102 4- y declare that the contents of the c	BOTECO 10, This consignment and are in all respects is o reduce the volume of treatment, storage	re fully and accu in proper condit and toxicity of w or disposal curr	Picifican 2	a. S 01 b. Led UP Ale 1 T 1 No. 000 700 escribed above by ransport by highwall be to me which	By MOKI	d. Of lando Of Lando Of Lando Of Lando of Lando of Lando
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P.O. Box 11488, Santurce, Puerto Rico 00910

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	UNIFORM HAZARDOUS WASTE MANIFEST	1 Generator's US EPA ID No		nifest tent No	2 Page			the shaded areas ed by Federal
13	Generator's Name and Mailing Address	PRD0007063	313 8 8 2	63	A State	1 law Manifest Do	cument	Number
	STATE OF THE PROPERTY OF THE P	BOBATION			A. State	Manifest Do	cument	Number
- 1	P.O. BOX 106 SABANA (-	B State	N / A Generator's	ID	
	Generator's Phone (809) 892-	The state of the second case . The case of the second case is a second case of the second						
5	Transporter 1 Company Name		EPA ID Number		C State	A B A N A Transporter's	GRAN	DE
1	PROTECO	1 1 1 1 1 1				orter's Phon	- 1	In I PO I T S
7	Transporter 2 Company Name	PRDOUS	EPA ID Number	5 2 2		Transporter's	ID 831	5-2058
	18/1	1 1 1 1 1 1	T 1 1 1			orter's Phon	e N.	/A
9	Designated Facility Name and Site Addre	ss 10 US	EPA ID Number		G State	Facility's ID	N	/A
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	Road 385, Km. 3.5 Peñuelas, Puerto Rico			1	H. Facility	's Phone	N	/4
		[P R D 0 9]	1 0 1 8 6	6 2 2	(809)	836-2058		
,	1 US DOT Description (Including Proper Shippin	ng Name. Hazard Class. and ID Number	,	12 Conta	iners	13. Total	14. Unit	
			,	No	Туре	Quantity	Wt/Vo	Waste No.
G a	HAZARDOUS WASTE SOL	ID . N .O .S .						Section 198
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	Unit TRAiler # XC	14 4803 78-6			IO	- NO. 0	00.10	6366/8981
1	GENERATOR'S CERTIFICATION: I hereby	declare that the contents of this consig			tely descr	ibed above by		131
	proper shipping name and are classified, pack according to applicable international and natio		respects in prop	er conditio	n for trans	sport by highv	vay	
	If I am a large quantity generator. I certify that		e volume and tox	ocity of wa	ste genera	ated to the dec	aree I hav	e determined to be
J.	economically practicable and that I have select future threat to human health and the environ-							
	the best waste management method that is a	vailable to me and that I can afford	ator, mave made	e a good (a)	tire itori to	, manimize my	wastege	neration and select
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Printed/Typed Name



COMMONWEALTH OF PUERTO RICO ENVIRONMENTAL QUALITY BOARD

P.O. Box 11488, Santurce, Puerto Rico 00910

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COMMONWEALTH OF PUERTO RICO P.O. Box 11488, Santurce, Puerto Rico 00910

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IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (309) 722-0439

Quality

Board

		UNIFORM HAZARDOUS	1 Generator's US EPA ID No	Docum	nifest nent No	2 Pag	e 1 Informati	on in th	e shaded areas d by Federal
	7	WASTE MANIFEST Generator's Name and Mailing Address	P.R.D.O.O.7.06	3 3 3 3 8 8	2 6 6	19,300,000,000,14-16	Manifest Doc	ument N	umber
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		P.O. BOX 106, SABANA	GRANDE, P.R. 00	753		B State	Generator's II)	
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	15	Special Handling Instructions and Addition	nal Information		e Inchile by	A ST To S S A ST			
		TEMPORARY STORAGE							
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		future threat to human health and the environ	rment, OR, if I am a small quantit	y generator. I have ma	de a good	faitheffor	rt to minimize my	waste ge	neration and select
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ENVIRONMENTAL QUALITY BOARD

P.O. Box 11488. Santurce, Puerto Rico 00910

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WASTE MANIFEST rator's Name and Mailing Address IG IT AL EQUIPMENT CO. . D. BOX 106, SABANA relator's Phone 1 809 1 892-1 sporter 1 Company Name BE HYDROBLASTING sporter 2 Company Name II/A greated Facility Name and Site Address OTECO d 385, Km. 3.5 Juelas, Puerto Rico LARDOUS WASTE SOLII I-E NA 9	GRANDE, P.R. 1.946 6 IPIR ss 10 IPIR ng Name. Hazard Class. and	US EPA II Of ID Number) Of 0	D Number 51.2 51.9 D Number 10 Number	6 7	B Stat C Stat D Trar E Stat F Trar G Stat H Faci (80)	e Manifest Door e Generator's SABANA e Transporter's Phone e Transporter's Phone e Facility's ID litty's Phone 9) 836-2058 13 Total Quantity	GRAN GRAN D 46- 836 D N N N 14 Unit Wt. Vol	NDE 15152=R -1110 /A
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20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest-except as noted in Item 19



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

WASTE MANIFEST Generator Name and Malings Address DIGITAL EQUIPMENT CORPORATION NOAD 368 Km 2.4 SABANA SHANDE, PR Q0747 (809) 892–1946 GISTAL EQUIPMENT CORPORATION ROAD 368 Km 2.4 GISTAL EQUIPMENT CORPORATION RELEASED CORPORATION RELE	UNIFORM HAZARIMINE	a (12-pitch) typewriter.) 1. Generator's US EPA ID No.	Manifest	2. Pag		The second second	50-0039 Expires 9-30 the shaded area
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ENVIRONMENTAL QUALITY BOARD

P.O. Box 11488, Santurce, Puerto Rico 00910

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	UNIFORM HAZARDOUS WASTE MANIFEST	1 Generator's US EPA ID N	Do	Manifest cument No D 16 18	2 Pa	ge 1 Informat is not law	requit	ne shaded area ed by Federa
3	Generator's Name and Mailing Address	PART A PRITO M			A Sta	te Manifest Doc	ument f	Number
	FIGURAL EQUIPMENT COR		- 1			10 E		
	F.D. BOX 106 SABANA GR	AHDE, F.R. 007	23		B Sta	te Generator's 1	0	***************************************
4	Generator's Phone 609 1892-194	66						
5	Transporter 1 Company Name	6	US EPA ID Num	ber	C Sta	te Transporter's	ID A N	1) 6
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7	Transporter 2 Company Name		US EPA ID Num	ber -	CONTRACTOR (CONTRACTOR)	te Transporter's	0.00	-2058
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20	Facility Owner or Operator Certification of			manifest e	хсерт а	s noted in Item		
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HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

UNIFORM HAZARDOUS WASTE MANIFEST Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION ROAD 368 km 2.4 SOBBANA, GRANDE, PR 100747 TEL. (809) 892–1946 Transporter 1 Company Name 6. US EPA ID Number ORLANDO GONZALEZ TNC. PR ID 10 10 17 10 16 13 16 18 18 19 19 19 19 19 19 19 19 19 19 19 19 19	C State C Stat	is not law. Is Manifest D. WIJA Is Generator's Phore insporter's Phore insporter'	ocument 431 ip s ID ne 833	1-5985 3-5521
DIGITAL EQUIPMENT CORPORATION ROAD 368 Km 2.4 SABANA, GRANDE, PR 100747 TEL. (809) 892-1946 Transporter 1 Company Name 6. US EPA ID Number ORLANDO GONZALEZ, TNC. 1p IR ID 10 In 17 In 16 3 6 TRAILER MARTHE TRANSPORTER 1p IR IT 10 In 15 15 In 16 13 6 TRAILER MARTHE TRANSPORTER 10. US EPA ID Number CHEMICAL WASTE MANAGEMENT, INC. Emelte Facility Alabana Highway 1/ at Mile Marker 163 Emetre, Alabama 35459 11 US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number) RQ, HAZARDOUS WASTE, SOLID N.O.S. ORM—E NA—9189 CWM Profile Number CWM Profile Number CWM Profile Number CWM Profile Number CWM Profile Number	A State C B. State D. Trans E. State D. Trans G. State H. Facility G. State P. Type B. A.	te Manifest D. WIJA te Generator a te Transporter nsporter's Phone te Transporter's Phone 15/652-9 13. Total Quantity / 5	4 3 1 s ID ne 833 721 14. Unit Wt/Vo	1.786 3-5985 3-5521 Weste No.
ROAD 368 Km 2.4 SABARA, GRANDE, PR 100747 TEL. (809) 892-1946 Transporter 1 Company Name 6. US EPA IO Number ORLANDO GONZALEZ, INC. IP IR ID IO IO IO 7 IO IG 13 IG Transporter 2 Company Name TRAILER MARTNE TRANSPORTER Designated facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emetle Faculty Alabama Highway 1/ at Mite Marker 163 Emetle, Alabama 35459 TUS DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) RQ, HAZARDOUS WASTE, SOLID N.O.S. ORM-E NA-9189 CWM Profile Number CWM Profile Number CWM Profile Number CWM Profile Number	G. Stat G. Stat G. Stat G. Stat G. Stat H. Faci 4 20 Containers D. Type B A	te Generator s te Transporter naporter's Phon te Transporter's Phon te Fecility's Phone 15/652-9 13. Total Quantity	s ID ne 833 ne 833 721 14. Unit Wt/Vo	3-5985 3-5521 Weste No.
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5. Special Handling Instructions and Additional Information				
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8 Transporter 2 Acknowledgement of Receipt of Materials	J			
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3	Generator's Name and Mailing Address				A Stat	e Manife	st Doc	ment N	umber
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5	Transporter 1 Company Name	6	US EPA ID Numb	oer					14274
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16	Van ID No. SCXU	w declare that the content	s of this consignment are fu	ally and accu	irately d	escribed a	bove by	000	
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HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

lea	ise print or type. (Form designed for use on elite ((12-pitch) typawriter.)	ii		Form	Approved ON	IB No. 205	0-0039. Expires 9-30-88
	UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. P R D O O O 7 O 6	Manife Document		age 1	Informati is not law.	require	he shaded areas ed by Federal
1	3. Generator's Name and Mailing Address		Liudiania di batan	A. 5		antifest Doc	ALCOHOL: TOTAL OF	umber
	DIGITAL EQUIPMENT CORPORAS	LION		Section 1	CWI	47, 5, 71	431	(81
1	ROAD 368 Km 2.4	mpr (000) 000	1076	B. 3	ilata Gi	narator's l	2	
П	SABANA GNANDE, PR 00747	TEL. (809) 892-	US EPA ID Number	16	vote Tr	unsporter's	10	
	THE CONTRACTOR CONTRACTOR STATEMENT	Transfer to the tra		100	CHEST L. P.	ter's Phane		5005
Н	ORI ANDO GONZALEZ, INC.	1P R D 1	US EPA ID Number	616 E.		ansporter's		2982
H		7		177	ranspor	ter's Phone	833	5521
1	9 Designated Facility Name and Site Address	ss 10.	US EPA ID Number	G.	State Fa	icility's ID		
1	CHEMICAL WASTE MANAGEMENT, IN	C.		Tar II		學與消費		0744501
	Emelle Facility Alabama Highway 17 at Mile Marker 163	A 1 D	0 0 0 6 2 2 4	33500		1 Phone 652-97	01	
	Emelle, Alabama 35459		0 0 0 6 2 2 4	2. Container	-	13.	14.	
	11. US DOT Description (Including Proper Shippin	g Name, Hazard Class, and ID N	umber)	No. Typ	~ 1	Total Quantity	Unit Wt/Vol	Waste No.
G E	RQ, HAZARDOUS WASTE, SOLI	D N.O.S.						
NE	ORM-E NA-9189		-24982	5 _B		17	\ \ \ \ \ \	F006
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1	15. Special Handling Instructions and Addition	#3.4# [//#64.4734]	A SECTION OF THE SECT		b.		d.	400
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	16 GENERATOR'S CERTIFICATION: I hereby proper shipping name and are classified, pact	declare that the contents of this ked, marked, and labeled, and ar	consignment are fully an	d accurately	describ or transp	ed above by out by highw	ау	
1	according to applicable international and nati	ional government regulations.			/			a datermined to be
	If Lain a large quantity generator, I certify tha economically practicable and that I have selec	ted the exact eable mathed of tre.	arment storage or dispos	al currently.	anadabl	e to me which	n minimiz	es ine present and
	future threat to human health and the environ the best waste management method that is a	ment, OR, if I am a small quantity ivailable to me and that I can affo	y generalia. Have made a	good to the		S	Z Z	
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Î	LUIS A. URETA 17. Transporter 1 Acknowledgement of Receipt	of Materials	4		_	-		1 16/19
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a	18.Transporter 2 Acknowledgement of Receipt							
RTER		Sign	nature					Month Day Ye
-	19 Discrepancy Indication Space			1				
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P.O. Box 11488, Santurce, Puerto Rico 00910

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	UNIFORM HAZARDOUS	1 Generator's US EPA ID No	Manifest	2 Pa			39 Expires 9-3
-	WASTE MANIFEST Generator & Name and Mailing Address	F 8 D 0 0 6 10 613 3 3 8	S 2.7 LO	of			d by Federa
8	DITITAL EQUIPMENT COR	PORATION		A Sta	te Manifest Do	cument Nu	mber
	E. J. SOK LOS SABANA GR				- N / A		
g.		DECEMBER OF THE WARRENCE DECEMBER 2012		B Sta	re Generator's	ID	
-	Generator's Priorie (509) 692-1 Transporter (Company Name	The state of the s			SABANA	GHAN	DE
		6 US EPA ID No	imber	C Stat	e Transporter's	1019-1	7550
7	Transporter 2 Company Name	- leknolaladı	3 6 2 2	D Trai	nsporter's Phon	836-	
i	3 /4.	. OS EPA ID NO	imper		e Transporter's		Α
Ä	Designated Facility Name and Site Address	s 10 US EPA ID No	ember		e Facility's ID	N.1.	š
	PROTECO			0 0.0.	o racinty 5 12	10 E - E	
	Road 385, Km. 3.5 Peñuelas, Puerto Rico			H Faci	lity's Phone	N/	Α
		PRD09101	8 6 2 2		9) 836-2058		
7.17	US DCT Description fincluding Proper Shipping		12 Cont	iners	13.	14	I.
			No	Туре	Total Quantity	Wt-Vo	Waste No.
a	HAZAKDOUS HASTE SOLI	D - N -O -S -					
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b		9 PROTECO Profile Number P 202	2 020	g Lul	وليافلواه	1	F 006
		PROTECO Profile Number	1 3 3		V 0 9 00		
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10	emporary Storage from	Trucking 1-12-89					
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17	: Led up by Wrondo Gonzalez	31					
16	GENERATOR'S CERTIFICATION: I hereby de	- \ clare that the contents of this consignment are f	fully and accura	rely des	cribed above by		
16	GENERATOR'S CERTIFICATION: I hereby de proper shipping name and are classified, packet	clare that the contents of this consignment are f	fully and accura	itely des	cribed above by nsport by highwa	ay	
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20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19



(As Required By The Alabama Department of Environmental Management)

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UNIFORM HAZARDOU WASTE MANIFEST	PRDbbbb7	Doc	Manifest cument No.	2. Page of	1 Informa is not law.	requir	the shaded areas red by Federal
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5 Transporter 1 Company Name	47 TEL. (809) 8	892-1946 US EPA ID Num	ber	C Stan	a Transporter's	ID.	
ORLANDO GONZALEZ, INC.	PR	D D D D D D D D D D D D D D D D D D D	D:03	14671 35 10 51	sportur's Phon		833-5985
7 Transporter 2 Company Name TRAILER MARINE TRANSPOR				TALL STATE OF	ransporter's sporter's Phon	AD STREET	833-5521
9. Designated Facility Name and Site CHEMICAL WASTE MANAGEMEN	Address 10.	US EPA ID Num	par D D D		e Facility's ID		
Ernelle Facility Alabama Highway 17 at Mile Marker Emelle, Alabama 35459	163	L D 0 0 0 6 2 :	2 4 6 4	BARRY N. BUTH	lity's Phone 5/652-97	721	
11 US DOT Description (Including Proper S			12. Cont	1	13. Total Quantity	14. Unit Wt/Vo	Waste No.
RQ, HAZARDOUS WASTE, SO ORM-E NA-9189	OLID N.O.S. CWM Profile Number	J=24982	1 5	B _i A _i	1 5	М	F006
ь.	CWM Profile Number				1 ()		
c.	SAME HAMILE						7 9 7 7 1
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J Additional Descriptions for Materials SOIL CONTAMINATED WITH	METAL HYDROXIDE	SLUDGE		14	lling Codes for V	3,04	sted Ahove
TRAILER # TPHU 411-		11					
16 GENERATOR'S CERTIFICATION: If proper shipping name and are classifie according to applicable international in If I am a large quantity generator, I cert	d, packed, marked, and labeled, nd national government regulation	and are in all respects in pons.	roper condit	ion for tra	nsport by highw	(8)	e determined to be
future threat to human health and the e the best waste management method III Printed/Typed Name	e selected the practicable method nvironment, OR, if I am a small q hat is available to me and that I c	d of treatment, storage, or o quantity generator, I have to can afford.	hsposal curr	ently avai	lable to me whic	h minimi waste ger	meration and select Month Day Ye.
LUIS A. URETA 17. Transporter 1 Acknowledgement of		AX	,	1001	aus Un	era	1 2 0 8 8
RubenBOVYE	.00	Signature	1	as	ieid		Month Day Yes
18.Transporter 2 Acknowledgement of Printed/Typed Name	necapt of Materials	Signature					Month Day Yes
19 Discrepancy Indication Space							
1							

20.Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

[UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet) PRD 0 0 0 7 (ID No. Mi	nifest nent No.	22.Pag	e Inform	nation in	the shaded ar ed by Fede	reas
		23.Generator's Name DIGITAL EQUIPMENT CORPORATION ROAD 368 Km 2.4			CI	te Manifest VMA 4 te Generator	31781	nt Number	13 .
	11		2-1946 US EPA ID Numb			te Transporte			
		CHEMICAL WASTE MANAGEMENT A. I. 26 Transporter Company Name 27.	US EPA ID Numb		P. Stat	te Transporte	er's ID		
	H	28. US DOT Description (Including Proper Shipping Name, Hazard C	lass, and ID Number)	29. Conta	Type	30. Total Quantity	31. Unit Mt/Vol	R. Waste N	lo.
		cwm Profile Number				-		- 410	
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		Additional Descriptions for Materials Listed Above			T, Hand 8. b. c.	dling Codes fo d, e, f,		Listed Above g. h. i.	The state of the s
	33	2. Special Handling Instructions and Additional Information TRAILER # TPHU 411-331-4							
İ	33	3. Transporter Acknowledgement of Receipt of Materials						Date	
TRANSPORTER		Printed/Typed Name Si	gnature	**********	CI.			tonth Day	Year
DR	3	4. TransporterAcknowledgement or Receipt of Materials						Date	
THE S			gnature	1			Ĩ	ionth Day	Year
ACIL	3	5. Discrepancy Indication Space							



COMMONWEALTH OF PUERTO RICO Environmental ENVIRONMENTAL QUALITY BOARD

P.O. Box 11488. Santurce, Puerto Rico 00910

Month Day

-	WASTE MANIFEST	P.R.D.O.O.O.	7.0.63 33	Bocument No	01	1 law		ed by Federa
3:	Generator's Name and Mailing Address				A Stat	e Manifest Doci	ument N	lumber
	DIGITAL EQUIPMENT					N/	Α	
	I. I. BOX 105 SABAN	IA GRANDE, P	.R . 00753		B Stat	te Generator's II)	
	Generalor's Phone (809) 892-					SABAN	10 (2)	ROMAN
-	Transporter 1 Company Name	6	US EPA IC	Number	C Stat	e Transporter's		17559-
15		4.0	1 12 12 4 4 4	1 1 6 7 15	D. Trai	nsporter's Phone		336-2058
_	PROTEGO Transporter 2 Company Name	- P	R D D 9 1 C	Number	E Sta	te Transporter's	ID -	
7	transporter 2 Company Name	9	000.		24.000	nsporter's Phone		- A/A
					A SAME	re Facility's ID		N/A
	Designated Facility Name and Site Addre	955 10	US EPA II	Number	G Sta	ie racinty's ib		
	PROTECO Road 385, Km. 3.5							N/A
	Peñuelas Puerto Rico				1000	ulity's Phone		
		P	B D 0 9 1 0	1 8 6 2 2	(80	9) 836-2058		
-				12 Con	tamers.	13 Total	14. Unit	L
nitri	US DCT Description (Including Proper Shipp)	ing Name, Hazard Class,	and its (vumper)	No	Type	Quantity	Wt Vo	Waste No.
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13	CHAZARDOUS WASTE SOL	10, N.O.S (F	306)				ii .	
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4	a. CONTAMINATED SOIL					b.		d.
		onal Information	k are					d.
	5 Special Handling Instructions and Addition		1 1 1 1 1 1 1					d.
	5 Special Handling Instructions and Addition TEMPORARY STORAGE	· jan 12 - 2 - 22 7	t, 12-16-80	/ J. ~				d.
	5 Special Handling Instructions and Addition TEMPORARY STORAGE	12-2-82 1 1-42 1-2 7	to 12-15-82	13				d.
	5 Special Handling Instructions and Addition TEMPORARY STORAGE	12.5-82 1 1-14: 12.5-82 1	17-16		urately d	b.		d.
	Special Handling Instructions and Additional PORARY STORAGE F	y declare that the content	nts of this consignment, and are in all respe	nt are fully and acc	urately d	b.	way	d.
	Special Handling Instructions and Addition of the PORARY STORAGE FOR STORAGE F	y declare that the content cked, marked, and labele stronal government regul	nts of this consignment ad, and are in all respondations	nt are fully and acc acts in proper cond	ition for	b. lescribed above by transport by high	way	
	5 Special Handling Instructions and Addition TEMPORARY STORAGE F	y declare that the conter cked, marked, and labele stional government regul	nts of this consignment, and are in all respectations	nt are fully and acc ects in proper cond	waste of	b. lescribed above by transport by high	oree I ha	ive determined to
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(As Required By The Alabama Department of Environmental Management)

ase print or type. (Form designed for use on elit	e (12-pitch) typewriter.)				Form Approved	OMB No. 20	50-0039. Expires 9-30-8
UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA	Doc	Manifest Iment No.	2. Page of			the shaded areas and by Federal
3. Generator's Name and Mailing Address DIGITAL EQUIPMENT CORP. ROAD 368 Km 2.4				C	o Manifosi Di WMA	431	783
SABANA GRANDE, PR 00747 5. Transporter 1 Company Name	TEL. (809)				e Gonarator's		t superior
ORLANDO GONZALEZ, INC.	6. IP IR	US EPA ID Numb		B44/87/88-31	a Transportar asportar'a Phoi	11000	3-5985
7 Transporter 2 Company Name TRAILER MARINE TRANSPORTE		US EPA ID Numb		報道の大学を表示の	a Transporter	s IU	
Designated Facility Name and Site Addr CHEMICAL WASTE MANAGEMENT, II	ess 10	US EPA ID Numb	er er	SERVICE IN SEC.	s Facility's ID	DOMESTIC STREET	3 = 5521
Emelle Facility Alabama High way 17 at Mile Marker 163				H. Faci	lity's Phone		A PROPERTY.
Emeile, Alabama 35459	1^1	L D 0 0 0 6 2 2			5/652-9		() () () () () () () () () ()
11. US DOT Description (Including Proper Shipp a.	ing Nama, Hazard Class, a	nd ID Number)	12. Coni No.	Type	13. Total Quantity	14. Unit Wt/Vol	Wasie No.
RQ, HAZARDOUS WASTE, SOLI ORM-E NA-9189	D N.O.S. CWM Profile Number	J-24982	29	ВД	12 10 1 1	м	F 006
b.							
C.	CWM Profile Number	f:					Foliated Parkins
d	CWM Profile Number			Ш			
	CWM Profile Number	r	1 1		1111		
J. Additional Descriptions for Materials List	ed Aboye			K. Hand	lling Codes for	Wastes Lis	sted Above
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			12/12/2	b. ?		di di	. 1. 1.
15. Special Handling Instructions and Additional TRAILER # XTRU 671-44							
16 GENERATOR'S CERTIFICATION: I hereby proper shipping name and are classified, pad according to applicable international and nat	ked, marked, and labeled,	and are in all respects in pro					
If I am a large quantity generator is critly that economically practicable and that thave selector to the threat to human health and the environ the best waste management method that is	cted the practicable method nment, OR, if I am a small q	fol treatment, storage, or dis uantity generator. I have ma	posal curre	ntly avail	able to me which	h minimize	es the present and
Printed/Typed Name LUIS A. URETA Auga	1 Serrano	Signature	Terry 1	Soo .	Cis Zh	orfa :	Month Day Year
17.Transporter 1 Acknowledgement of Recei					_, _, _,		
NUBEN BAL	rero	Signature &	Ba	w	ш		Month Day Year 1 20 8 8
18.Transporter 2 Acknowledgement of Receip	pt of Materials	Signature					Month Day Year
19 Discrepancy Indication Security							
19.Discrepancy Indication Space							

20.Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

	rint or type. (Form designed for use on elite				Form Approved.	OMB No. 20	050-0039, Exp	ires 9-30
	WASTE MANIFEST		Manifest ocument No. 8 8 1 0		e Informa	ation in t	he shaded ed by Fe	areas
23	Generator's Name			L. Stat	e Manifest C	ocumen	t Number	
1	GIGITAL EQUIPMENT CORPORATION	าห		CV	VIVIA 4	31783	1 63	
I	ROAD 368 Km 2.4	, , , , , , , , , , , , , , , , , , ,		M. Stat	VMA 4	s ID	11000	8/10
4	ABANA GRANDE, PR 00747 Transporter 3 Company Name	TEL. (809) 892-1946		EDHA .				
				N. Stat	e Transporter	's ID	Security of	-
(Transporter Company Name	EMENTIALD 099202	1681	O. Tran	sporter's Pho	one		1.77
25	Transporter Company Name	27. US EPA ID Nu	mber	P. Stat	a Transporter	's ID	1100	
		1		Q. Tran	sporter's Pho	one	487 5 75	
28	US DOT Description (Including Proper Ship	ping Name, Hazard Class, and ID Numb	29. Cont	1	30. Total	31. Unit	R. Waste	
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-	ransporter Acknowledgement or Receipt	nt of Materials	***************************************				Date	
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_	rinted/Typed Name	Signature				M	onth Day	Year



COMMONWEALTH OF PUERTO RICO ENVIRONMENTAL QUALITY BOARD

P.O. Box 11488. Santurce, Puerto Rico 00910

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WASTE MANIFEST			Docum	ient No	2 Pa	is no	t requir	the shaded are ed by Fede
3 Generator's Name and Mailing Address	# R-0 0 0 7	تنقنهن	A M I M	2 7 2	A Sta	te Manifest Do	cument !	Number
	O D U O D . T TO H				m Sta	te Mannest Do	cument i	Number
DIGITAL EQUIPMENT CO		00253			B. Sta	te Generaldra	10	
P.G. BOX 106, SABANA		. 00751			210	ing special and a	11.0:	
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ed to bloom the contribution newscars		US Er	S ID Number			nsporter's Phor	4.13	-14 - 24
7 Roy (E.C.) Transporter 2 Company Name	بإبارة	0 0 0 10	VID Number	1 4 5	05 05	te Transporter	2. 34	6-2056
Company Marie		US EF	4 ID Number		211000000000000000000000000000000000000		3 10	N/A
3.15						nsporter's Pho	ie.	N/A
Designated Faculty Name and Site Address PROTECO.	s 10	USEP	A ID Number		G Sta	te Facility's ID		11.14
PROTECO Road 385, Km. 3.5								H/A
Peñuelas, Puerto Rico						ility's Phone		
	P R	D 0 9 1			(1)	9) 836-2058		
11 US DC1 Description Uncluding Proper Shippin	g Name, Hazard Class, an	d ID Numberi		12 Conti	amers	13 Total	14 Unit	Waste No
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b	189 PROTECO Pro	Tile Number	2022 0	120	C M	000 20	T	F 006
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ċ.	PROTECO Pro	file Number					-	
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J Additional Descriptions for Materials Listed		ille iddiliber	E2827486	4	K Han	dling Codes for	Nastes Lis	sted Ahove
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15 Special Handling Instructions and Addition	al Information					b.	P	d.
-		f. 12.10				b	R	d.
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TEMPORARY STORAGE	from 12-2-05	t. 12-12	13-12	,		b,		d,
TEMPORARY STORAGE	from 12-2-08 Garak & T -X211741-7	4 3	11:45 - 16:51		ately de			d.
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(As Required By The Alabama Department of Environmental Management)

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COMMONWEALTH OF PUERTO RICO

Environmental ENVIRONMENTAL QUALITY BOARD

P.O. Box 11488, Santurce, Puerto Rico 00910

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20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19



(As Required By The Alabama Department of Environmental Management)

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4	UNIFORM HAZARDOUS WASTE MANIFEST 21. Generator's US EPA ID No. Manif	nt No.	22.Pag	e Informa is not law.	requir	the shaded areas ed by Federal
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	23. Generator's Name		-	e Manifest D	Transfer Cont.	it Number
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	CHEMICAL WASTE MANAGEMNT A L D 0 9 9 2 0 2 6. 26 Transporter Company Name 27. US EPA ID Number	debendard.				Hardwick and
	20 Transporter Company Name 27. US EPA ID Number	1	DIE ST	a Transporter		
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	28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	Contai	ners Type	30. Total Quantity	31. Unit	R. Waşte No.
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COMMONWEALTH OF PUERTO RICO ENVIRONMENTAL QUALITY BOARD

P.O. Box 11488. Santurce, Puerto Rico 00910

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	UNIFORM HAZARDOUS	1 Generator's US EPA		Manifest ument No	2 Pa			the shaded are
3	Generators Name and Mailing Address	PRD0007	0.6 8 3 3 3 8 8	12 7 4	of	1 law	THE STATE OF THE S	Social Programme
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7	PROTEGO Vransporter 2 Company Name	1 P B	US EPA ID Numb	6 2 2	D. Ira	insporter's Phon ite Transporter's	836-	-2058
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l.	PROTECO PROTECO	55 10	US EPA ID Numi	Deer	G Sta	te Facility's ID		
	Road 385, Km. 3.5				H Ex	cility's Phone		
	Peñuelas, Puerto Rico	77		74	1120	9) 836-2058		
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15	TEMPORARY, STORAGE,	from 12-2-5	88 to 1-18-8	39			W ma a "	
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16	generator's certification: I hereby proper shipping name and are classified, pack according to applicable international and national are generator. I certify that economically practicable and that I have select future threat to human health and the environing best waste management method that is as Printed Typed Name. LITS URETA	declare that the contents of ed. marked, and labeled, a conal government regulation. I have a program in place led the practicable method ment, OR, if I am a small givallable to me and that I can be seen	of this consignment are ful and are in all respects in pr ins to reduce the volume and of treatment, storage, or di uantity generator, I have m an afford	lly and accur roper condition toxicity of wi isposal curre	ately de on for to aste gen only ava	escribed above by ransport by highw nerated to the deg ailable to me whic	ray gree I hav h minimi	e determined to zes the present a neration and seld Month Day
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(As Required By The Alabama Department of Environmental Management)

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UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. P R D 0 0 0 7 0 6 3 3 3 8 0	Manifest		2 is not	requir	the shaded area red by Federa
Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORA ROAD 368 Km 2.4	TION		C	WMA Generator's	431	789
SARANA GRANDE, PR ,00747	TEL. (809) 892-1946	wher	C State	Transporter's	In the	Tell in Alace The William Control
ORLANDO GONZALEZ, INC.	I PIRIDIO I OLO ZIOLE 8. US EPA ID Nun	10001	D. Yran	sporter's Phon	833	5985
Transporter 2 Company Name	9 2 2 2 4 7 7 7 9 9 9		19/9/2011 12:00	s Transporter's sporter's Phon	THE PARTY OF	5501
TRAILER MARINE TRANSPORTE Designated Facility Name and Site Addre		nbar	G. Stat	a Facility's ID	633	-5521
CHEMICAL WASTE MANAGEMENT, IN Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459	A L D 0 0 0 6 2	2 4 6 4	BEFORE TO STATE	lity's Phone 5/652-97	721	
US DOT Description (Including Proper Shippi		12. Cont No.	Type	13. Total Quantity	14. Unit Wt/Vo	l. Waste No.
RQ, HAZARDOUS WASTE, SOLI ORM-E NA-9189 m	D N.O.S. CWM Profile Number J-24982	15	ВІА	1151	М	F006
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Additional Descriptions for Materials Lists	nd Above		K. Han	dling Codes for I	Wastes L	isted Above
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	Public reporting		or th	is collect	on of	information
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COMMONWEALTH OF PUERTO RICO **ENVIRONMENTAL QUALITY BOARD**

P.O. Box 11488, Santurce, Puerto Rico 00910

	UNIFORM HAZARDOUS WASTE MANIFEST	P. P. H. C. O. O. 7	Dos	Manifest ument No 3 7 5	2 Page of 1			he shaded areas ed by Federal	
3	Generator's Name and Mailing Address		Ada a Managara da ang banggara		A State	Manifest Doc	ument I	Number	
	OPPITAL EQUIPMENT C		4.			N/A			
	F. D. 308 106 SABANA	GRAHDE, P.K.	. 60753		B State	Generator's II)		
9	internor's Philips 1								
5	Transporter 1 Company Name	6	US EPA ID Num	berk		Transporter's		-17550-R	
-4-	PAGTSON Transporter 2 Company Name	12 8	0 0 9 1 0 1 3 US EPA ID Num	6 2 2		porter's Phone		-2058	
/	transporter 2 Company Name	8	US EPA ID Num	ber	2000	Transporter's			
	Descripted Facility Name and Site Addre		US EPA ID Num	سلسلية		porter's Phone			
	PROTECO	10	US EPA ID NUM	ber	G State	Facility's ID			
	Road 385, Km. 3.5				H Facili	ty's Phone			
	Peñuelas, Puerto Rico	Lnin	I WILL WILL BE I A TO A TO A TO A TO A	ota tata	WALL TANGETON	836-2058			
			D 0 9 1 0 1 8	12 Cont	ainers	13	14		
	US DC.F Description (Including Proper Shippin	ng Name. Hazard Class, and	(ID Number)	No	Type	Total Quantity	Unit Wt Val	Waste No.	
d	KQ, HAZARDOUS WAST	E SOLID, N.O.	s. (F006)						
	ORM-6 NA9189						-	(2006)	
D		PHOTECO Prof	ile Number p 2022	1940	9.5	900120	I	(F 006)	
<i>**</i>									
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J	Additional Descriptions for Materials Liste	ed Above			K. Handli	ing Codes for W	astes Lis	sted Above	
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15	Special Handling Instructions and Addition	nal Information	Yanamar Amaria			21			
3.0			1-11-89						
	TEMPORARY STORAGE	From 12-2-8	ing						
	Picked up by Delando	671-201-9							
16	GENERATOR'S CERTIFICATION: I hereby				ately desc	ribed above by			
	proper shipping name and are classified, pack according to applicable international and national			roper conditi	on for tran	isport by highw	34		
	If I am a large quantity generator. I certify that			toxicity of w	aste gener	rated to the deg	ree I hav	e determined to be	
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1.8	3 Transporter 2 Acknowledgement of Receip	of Materials		-17/	2				
	Printed Typed Name	10,00	Signature	61 14	\bigcirc			Month Day Yea	
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15	B Discrepancy Indication Space								
							10		
20	Facility Owner or Operator Certification of	A DESCRIPTION OF THE PROPERTY		s manifest	except as	noted in Item	19	Month Day Yea	
	Printed/Typed Name		Signature / /					Month Day Yea	



(As Required By The Alabama Department of Environmental Management)

			Form Approv	AMO De	No. 205	0-0039. Expires 9-3
UNIFORM HAZARDOUS 1. Generator's US EPA ID No.	Manifest Document No.	2. Page	1 1 -			ne shaded area
WASTE MANIFEST PRIDIDIDIDIDIDIDIDIDIDIDIDIDIDIDIDIDIDID	9001	of	2 law	9)		
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DIGITAL EQUIPMENT CORPORATION		単し	WAAA	4	31	185
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11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Con	ainers	13. Total		14. Unit	
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15. Special Handling Instructions and Additional Information						
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ENVIRONMENTAL QUALITY BOARD

P.O. Box 11488. Santurce, Puerto Rico 00910

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SOIL CONTAMINATED WITH M 5. Special Handling Instructions and Addition TRAILER # SCXU 403–983–3 16. GENERATOR'S CERTIFICATION: I hereby proper shipping name and are classified, pact according to applicable international and nat if I am a large quantity generator, I certify that economically practicable and that I have select future threat to human health and the environ the best waste management method that is a Printed/Typed Name LUIS A. URETA 17.Transporter 1 Acknowledgement of Receipting Typed Name 18.Transporter 2 Acknowledgement of Receipting Typed Name	Public reports and Information attinuted to avera transporters, and facilities. This gathering data, comments regarding reducing this bur reducing this reducin	includes includes and complet the burden den, to: commental P. 460; and condition to	or thing and estimated the format in the control of	a collection generate estment, a for review in stee, includ Information Agency Office of the degree and ated to the degree of th	ora, I torage wing ag the ing su ion Po , 401 f Iufo Budger, eethave minimizes astegene M	and dispose instructions form. Sens greations for it is greated to be street S.W. or wation and variant and ration and select fonth Day Year on the present and ration and select fonth Day Year on the Day Ye

Exhibit #2 EQB inspection reject octubel is, live

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LECTIONS AUST DIVISION

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11 Quinte of Que tad

Lovironmental opecialist

Protección Técnica Ecológica

Pesuelas, Puerto Rico

PED 091018622

the active mentioned facility was visited on September 1 and a, 1900. Luring the visit a full hoad Tab facility inspection was performed.

Attaches, presse fire the following cocuments in regard to this inspection:

- Intrection lots
- neletted to blo

A copy of this report should be subsitted to EPA kepich it, since this facility is under the entorcement action.

15-6

LUCZUBULL

SUMMARY OF FINDINGS

INCIDITA BESCHIFTION AND OFLERATIONS

lrotection Técnica Ecológica (Pholico) is a commercial lab facility. It is located at Peffuelas, Puerto Rico. On Lepterber 1 and 2, 1900 an inspection was performed to the iscility.

hanagement of hazardous wastes at PROTECO began before 1500. The following are the units used to treat, store or eispose the hazardous wastes received from Generators in the Island:

Containers storage area
Tank storage area
Containers landfill
Neutralization impoundments
Uil lagoon
Land treatment area

As result of an agreement with EPA and EQE the only unit in use is the containers storage area. For all other units FROIDCE will have to submit Closure Plans in order to comply with a Consent Degree granted by the US Department of Justice.

At present, the wastes received by PkOTECO are containerized wastes which are stored in the drum storage area, and non-hazardous wastes from waste water treatment facilities that are placed in a non-nazardous waste landfill.

The majority of PROTECO's customers are small quantity generators (SQG). Prior to acceptance of any hazardous waste the Generators (including SQG's) are required to test each waste stream to be stored, at least, for the four hazardous wastes characteristics.

The received wastes are not chemically analyzed by PAUTLOU in order to determine if they match the specifications contained in the accompanying manifests. The only parameters tested by PROTECO's personnel on each incoming load are ph, frashpoint, viscosity, water content, cyanides and sulfides.

At the time of the visit I found that the dikes surrouncing the drum storage areas and the dikes that separates the corrosive wastes from flammables wastes are not in good conditions. An advise was given to the person in charge of the site operations, engineer Laracuente, to repair those earth

Another finding was, that Pholeto has received a lot of trailer vans from Digital of Sabana Grande containing contaminated soil (but waste), eight (6) of them are stored within the precises of the drub storage area (no. 4 on the attached ciagram), nine (5) trailers are stored over the Immobilization area (no. 10 on the attached clagram). According to hiss. Hernandez this will be a temporary storage area because the trailers are going to be send to a disposal facility in the states during the months of September and October.

In relation to the Land Disposal Restrictions stated in 40 GFR Part 200, it was found that PROTEGO stores Land Banned wastes for more than one year, in violation of 40 GFR Part 200.50. According to the logs kept at the facility, some of the shipments stored at the site for more than one year are:

Date received/ stored	Company	Waste No.	Manifest No.	Quantity
5-11-06	Information Magnetics	D010- F002	00002	275 g.
4-0-06	Davis & Geck	FUU3	86-06	266 p.
5-0-66	Emerson (Dorado)	FUUL	00003	440 6.
0-20-06	Lavis & Geck	F003	00001	130 p.
0-20-00	Davis a Geck	FUUS	00001	2000 p.
16-5-56	Emerson (Dorado)	F001	00006	27 g.
10-9-86	Emerson (Doraco)	F003	00006	55 g.
12-25-60	Information Magnetics	F003	2-86	16 g.
2-6-07	Lutron	F601	60001	385 g.

P.B/sec

CONCLUSIONS AND RECOMMENDATIONS

At the time of the inspection it was found that Protección Técnica Ecológica was not in compliance with all the state and federal regulation requirements.

The following is a list of violations found during the inspection:

1- 40 CFR 265.177 (c) and RCHNHSW Rule 812 D (3) (b) state that a storage container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, must be separated from the other materials by means of a dike, berm, wall or other device.

The wastes stored in containers by PROTECO are separated by waste type by means of earth dikes. Those dikes were found in bad conditions (deteriorated) at the time of the inspection. Therefore the company is in violation of this rule

2- Nine (9) trailers containing soil contaminated with F006 waste from Digital of Sabana Grande are stored in a not designated storage area. This area was designated and used as an Inmobilization Area (see no. 16 in the attached facility diagram). At present, this Inmobilization Area is inactive. This is a change in the storage process that was not notified (a revised Part A should be submitted to notify the change along with a justification), and it is a violation of 40 CFR 270.72 and RCHNHSW Rule 916 C.

3- 40 CFR 265.52 and Rule 207 of the RCHNHSW describe the Contents of the Contingency Plan that must be kept at the facility. One of the requirements include a list of the emergency coodinators, and this list must be kept up to date. At the time of the inspection the list of emergency coordinators included in the facility's contingency plan was not up dated. Therefore the facility is in violation of this rule.

4- 40 CFR 265.31 and Rule 810 (B) of RCHNHSW requires that facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water which could threaten human health or the environment.

At the time of the inspection, it was discovered that a group of containers are stored in direct sunlight and to not have continuous base, impervious to the stored waste. There fore, facility is in violation of this section.

5- 40 265.177 and Rule 812 (B) (4) of RCHNHSW states that the owner or operator storing hazardous waste containers shall provide sufficient confinement structures to contain leakage or spills within the designated storage area, including, but not limited to, dikes, berms or trenches.

At the time of the inspection, there were no dikes or berms to contain leakage or spills within a group of containers stored at the containers storage area. Therefore, facility is in violation of this section.

6- Rule 812 (B) (1) of RCHNHSW states that the hazardous waste facilities that store containers of hazardous waste must have a continuous base which is constructed so that any surface run off or spill can be contained until the spilled waste can be removed for either treatment or final disposal. At the time of the inspection all the containers were stored directly over soil.

07

- 7- Violations to Land Disposal Restrictions:
 - a) PROTECO's waste analysis plan has not been revised to include the test required to be performed to the waste subject to restrictions and the frequency of those testings (40 CFR 265.13).

Ver

b) Storage of wastes subject to restrictions for more than one year (40 CFR 268.50).

Since this facility is under EPA Region II enforcement action, is recommended to send a copy of this report to that office for the pertinent action.

PMB/sec

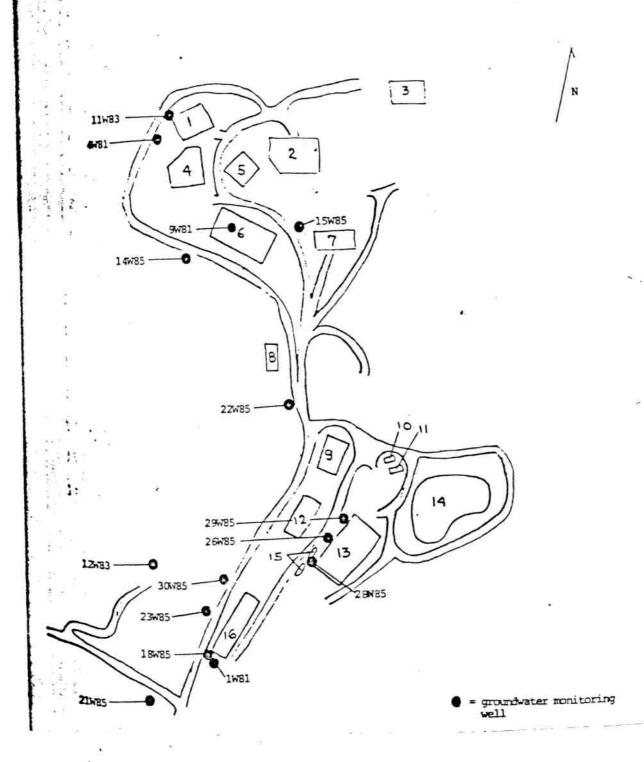
PROTECC

SITE MAP LEGEND

humerical Designated	Unit Description
1	Landfill, pre-RCKA drum burial
2	Landfill, pre-RCRA drum burial
b	Lendfill, pre-RCRA drum burial
4	Drum storage area (active)
J	Landfill, pre-kCRA drum burial
t	Sanitary landfill
7	Lagoon, corrosive waste
ö	Landfill, pre-kCKA drum burial
5	Lagoon, oil
10	lmmobilization area (inactive)
11	lmmobilization area (inactive)
12	Leno application area (active)
15	Lagoon, rainwater (active)
14	Land application, non-hazardous (active)
15	Tank storage area (active)
16	Immobilization area

RCRA INSPECTION REPORT

Report prepared for:
Generator //
Transporter //
H.h. (TSD) Facility /X/
Copy of Report Sent to:Facility _V EPA-Region II
Facility Name: Protección Tecnica Ceológica (PROTECO)
wedi Aduress: Road 385, Km 3.5, Bo. Jallatva, Peñvela
Postal Address: Firm Delivery (phot xo. 836-2123)
Ponce P.R. Zip Code 00 724
E.P.A. ID # PRD 09/018622
Date of Inspection: September 1-2, 1988
Time In: 830 Time Out: 430
Photos Taken: /_/ YES /X/ NO
If yes, how many?
Samples Taken: /_/ YES /X/ NO No.of Samples
Participating Personnel
E.Q.B. or E.P.A. Personnel: Priocilla Bestard
Facility Personnel: Marta Harvandez, Chemist.
Report Prepared by: (Name) Priscilla Bestard
Agency: Environmental (Quality Beard
Telephone Number: (809) 732 - 6437
Approved for the Director by:
/sec



HAZARDOUS WASTE FACILITY STANDARDS (40 CFR Part 265 and Parts 803 and 820 of the RCHNHSW)

265.13 (a)/ 807 I - Waste Analysis	YES	NO	N/A
Company maintains a detailed chemical and physical analysis of a representative	\checkmark		:
sample of the waste or each waste.			
The waste(.s) handled at the facility change Check only one:	\checkmark		
Change day to day /V/			
Week to week /_/			
Years or quarters /_/			
Therefore: Check only one:			
Waste characteristic vary $ \overline{V} $			
All waste(s) are basically the same /_/			
Co. treat all waste(s) as hazardous /_/			
265.13(b)/ 807 I (5) Waste Analysis Plan			
Company maintains a written Waste Analysis Plafacility.	an (MAP)	at tr	ne
If no explain:			
			7
WAP contains the following:		a.	
1. Proper parameters Specity: pt. Wash point, free legalds	, cum	ides	outides

2. Proper test methods			7.000 Miles	
1 + 11 + 1 +	<u></u>		7	
Specify: lest methods for evaluating	solid	waste	"- SW 846	
Specify: Jest methods for evaluating	(C)		STATE OF THE PROPERTY OF THE P	
*		a 8		
2 Describe america por motivore	1			
3. Proper sampling methods				
" tot will be a which.		7.	De Louis	
Specify: "Jest methods for evaluating	goua	wante	- 300 846	
4. Review or Repeat analysis	\angle			1
Frequency: overy shipment received on	Dank	trucks	and vaccom	Lu
4. Review or Repeat analysis Frequency: wery shipment received on and 10 % of containers 265.13 (b X 5)/807 I 6 For off-site facilities	Los euc	h seecis	tic wester	··
265.13 (b X 5) / 807 I 6 For off-site facilities	3	each	ahipment.	
	YES	110	~ : /A	
For off-site facilities the WAP contain the	222			
waste analysis that hazardous waste generators				8
have agreed to supply	,/			
have agreed to suppry	1			
Now workers the procedures which will be used	1			
Also contain the procedures which will be used	4			
to identify changes in waste stream				
Characteristics	/			
	~			
The the their sections are sufficient to the companies of			50	
Does the hazardous waste come to this facility	<i>(</i>			
from an outside source?. If yes, list the	. /			
name(s) of generators.				
a/ . + + · · · · · · · · · · · · · · · · ·	. 1.			
Has underes wast serinating in the	colound			
140000000000000000000000000000000000000				
- Hazardous waste generators in the				
If waste comes from an outside source, are the				
If waste comes from an outside source, are the procedures in the WAP to insure that waste	ere			
If waste comes from an outside source, are the	ere			
If waste comes from an outside source, are the procedures in the WAP to insure that waste	ere			
If waste comes from an outside source, are the procedures in the WAP to insure that waste received conforms to the accompanying manifest	ere			
If waste comes from an outside source, are the procedures in the WAP to insure that waste	ere			
If waste comes from an outside source, are the procedures in the WAP to insure that waste received conforms to the accompanying manifest The WAP describe:	ere			
If waste comes from an outside source, are the procedures in the WAP to insure that waste received conforms to the accompanying manifest. The WAP describe: 1) procedures used to determine the identity	ere			
If waste comes from an outside source, are the procedures in the WAP to insure that waste received conforms to the accompanying manifest The WAP describe:	ere			
If waste comes from an outside source, are the procedures in the WAP to insure that waste received conforms to the accompanying manifest. The WAP describe: 1) procedures used to determine the identity	ere			
If waste comes from an outside source, are the procedures in the WAP to insure that waste received conforms to the accompanying manifest. The WAP describe: 1) procedures used to determine the identity of each shipment	ere			
If waste comes from an outside source, are the procedures in the WAP to insure that waste received conforms to the accompanying manifest. The WAP describe: 1) procedures used to determine the identity of each shipment.	ere			
If waste comes from an outside source, are the procedures in the WAP to insure that waste received conforms to the accompanying manifest. The WAP describe: 1) procedures used to determine the identity of each shipment 2) sampling method used to obtain representative sample of the waste to	ere			
If waste comes from an outside source, are the procedures in the WAP to insure that waste received conforms to the accompanying manifest. The WAP describe: 1) procedures used to determine the identity of each shipment.	ere			

Comments:			
		* 0.	
265.14/ 803D Security	YES	NO	N/A
The facility have: 1) 24 hour surveillance system			
Check one: television monitoring surveillance guards			
2) artificial or natural barrier Eyclone fence 3) Are there signs with the legend "Danger - Unauthorized Personnel Keep Out" and "Peligro - Prohibido el			
paso de personal no autorizado" posted at each entrance to the facility. If no, explain what measures are taken for security.	\checkmark		-
265.15(a)/803-F General Inspection Requirem	ents		
Has the owner or operator developed and follow a written schedule of inspecting?	YES	NO -	A\N
Monitoring equipment	V V		
safety equipment	V	<u></u>	
emergency equipment	~		
security devices	1		

	YES	NO	$A\setminus B$
operations and struct equip.	V		
.This written inspection schedule (Plan) is kept at the facility.	\checkmark	• ·	
.The schedule identifies:			a e
 types of problems to be looked for during the inspection 	V	18	
Specify: Check for leaks, improper droms, etc.	labels	, deter	ionated
			_
2) frequency of inspection:	01		
a) daily inspections (unloading)			_
b) weekly container inspections			<u> </u>
c) weekly tank inspections	V		
a) weekly surface imp. insp.	V		
e) daily incinerator inspections			\angle
f) daily thermal treat inspections			$\underline{\checkmark}$
g) daily chem./phys./bio inspections			u
3) malfunctions	~		
Explain: Remedial actions are establishment Plan.	listed o	r the p	acitely's
Does the owner/operator record inspections in a log?	1		_
.These records are kept for at least three (3) years from the date of inspection.			

	YES	NO H/A	
Inspection log include:		2000 € 50 ° 50 ° 50 ° 50 ° 50 ° 50 ° 50 °	
1) date of inspection	~		
2) time	V		
3) name of the inspector	<u>/</u>		
4) observations made	_/		
5) date and nature of remedial actions	V		
Section.	ince wi	th His	*
265.16/R 808 - Personnel Training Records			
A. Facility personnel have successfully completed a program of training since six months after the date of their employment:	∠.		
B. Trainer's Name and Title: Mr. Onch Evrig Compliance Officer	- 11		
Compliance Officer Trainer's Qualifications: He has attended semmans and has worked as	ided 4	Pazardores u	raste
related senumars and has worked as	lumn	ventul courd	inates for
C. Description of Training: RCRA Regula	itions.	Personnel	res Styles
prefective equipment and patety, of. Waste Cinalisms Plan, Lansportate D. Records of Training:	in and	Response,	l waits.
Job title for each position	V	*	
Name of employee filling each job	/		

	YES	NO		
Job descriptions for each position	V			
Description of the type and amount of both introductory and continuing	<u> </u>	- 1		
training	() ()			
	YES	110		
E. Training records on all current employees are kept until closure and for former employees are kept for at least three (3) years.	/			
F. Annual review	~			
CUMMENTS: The last training was given	- a	Septem	her 4, 19	87.
The training for new temployees	uas	given	ou	
Casil & Jides		0		
- gru o, 1100.			9 ()	
265.17 General Requirements for Ignitable, Real Incompatible Wastes HW nandled at the facility are ignitable incompatible, and reactive If no, continue to the next section	YES		А\ Л ——	
Ir yes:				
2				
 Adequate handling procedures (to prevent leakage, spilling and container rupture) 	V			
2) "No Smoking" signs are placed conspicuosly:	V	-	-	
 Separation from sources of ignition or reaction is provided (Regs. state more than 50 feet) 				
4) Confinement of smoking and open flame to specially designated locations is established. (Check "No Smoking Signs	<u>/</u>			
5) Any Leaking or Badly Damageo Containers (eg. bulging or neat)	- /	~		

	Comments: Company is in compliance	e with
	this section.	
		\$48 - 28 14
Sul	bpart C - 265.30/R 810 - Preparedness and Preventio	n
Α.	YES Required Equipment:	NO
	1) Internal comm/alarm system	-
	2) Telephone/2 way radio	-
	3) Portable Fire Control Equipment	
	4) Adequate Water/Pressure (Fire Control)	
	5) Spill Control and decontamination	
В.	Equipment Test Result	
С.	Access to comma/alarm system:	
	Adequate. Supervisor use a mobile wit. They also have air blast he an interval afarm.	le sodio
	Adequate Aisle Space	
E.	Local Authorities Arrangements (Evidence)	

COFFIGENTS:	
	÷ -*
Subpart D 265.50/R 207-Contingency Plan (CProcedures	CP) and Emergency
A. Plan on Site	YLS NO
b. Was Emergency Plan Followed?	
C. Content of Plan:	
1) Description of actions the fac. personnel shall take in response to emergencies.	
2) SPCC Plan/40 CFR 112 or Part 1510 Did the owner/operator amend this plan?	?
3) Local Authority Arrangements	<u> </u>
4) Identify Emergency Coordinator	
(The plan must list names, addresses and phone numbers of all persons qualified to act as emergency coorditor and this list must be kept up to	ına-
5) List of emergency equipment	. <u>V</u> _
(Is the list kept up-to-date? Does plan include the location and physical description of each item?)	
6) Evacuation Plan (signals to be used to begin evacuation, evacuation rout or alternative)	

	YLS	NO	
D. Copies of Contingency Plan are maintained at the facility	<u> </u>		
E. CP has been submitted to local authorities	~		
F. Has any Emergency occurred?		\angle	
Contingency Plan reeds to be update emergency coordinator is not up.	of the dated.	list	of the
Subpart E - 265.71/504 D(1) - Manifest syste off-site facilities only)	m Operat	:10n (f	or
Operator sign, date, and retain copy of each manifest that accompanies each shipment onto the site	YES	NO ——	N/A —
Does the o/o has a procedure which will be used to inspect and if necessary analyze each snipment of HW received at the facility to ensure that it matches the identity of the waste designated on the accompanying manifest			
Has the operator found discrepancies in manifest and waste loads? If yes, what actions were taken by the off-sifacility to reconcile the discrepancy with the waste generator or transporter			3
Waste has been returned to	generati	元·	
		2	
The operator accept wastes at the facility that were not accompanied by a manifest. If yes, what actions were taken by the operator to obtain information on the generator who sent the waste.	===	\angle	2 (************************************

		<u> </u>	
265.73/ 502 C Operating Record		56	
The operator maintain a written operating record at the facility.	<u> </u>	: 	-
This record includes:			
1) description of the waste	V		
2) quantity	~		
3) method of treatment, storage or disposal	<u> </u>		
4) date of treatment, storage or disposal	1/		
5) location of the waste	~		-
6) final disposition of all wastes	~		
7) records and results of waste analysis	·		
8) records and results of inspections	~		##************************************
 closure cost estimates and post closure cost (if apply) 	~		
Comments:			
_ Company Keeps a daily exercis	ting lo	a Co	read
The quantity and type of all has	aldon.	l axac	to that
es licated, stired in disposed at	the k	white.	7
PRUTECO is in compliance with	4 this	section	· · ·

262 20/703 - Manifest Requirements

262.20/703 - Manifest Requirements		or grand and a
A. How many shipments off site since Nov. 19, 1 made: -Describe also, the approximate size of shipment made on a monthly basis:	980, ha Fan ave	ave been erage
311 17 11 21 12		
$ \sqrt{\Lambda}$		
B. Check the most recent manifests, for:		
	YES	NO
a) Generator's ID number	~	a-3
b) Document Number	~	
c) Generator's address and phone number		
d) Transporter's Name and ID Number	~	, -
e) Date of shipment and signatures	<u></u>	
f) Waste shipping name (DOT)		
g) Waste hazard class (DOT)		
h) Waste quantity or volume		
1) Waste No. EPA		
j) Type and number of containers		-
k) Designated TSD facility	$\overline{\nu}$	
(name and ID number)(may specify an alternate facility)		
1) Handling Codes For Wistes	V	-
C. Check Emergency Information on Manifests:	V	8
 Immediate response information 	<u> </u>	
2) Special handling instructions		

3) Emergency contact (phone number) D. Check for Certification Statements: Signed E. Check if exception reports been submitted to the EPA and EQB covering any shipment made more than 30 days ago.	
all the revised manifest contained the required information. PROTECO provides the generators with assistance in filling the document. Company is in compliance with this section.	

© .

265.74/ 505 B, C, D Availability, Retention and Disposition of
Records
All records, including plans are available = =
Comments:
Cell documents were available for inspection
Cell documents were available for inspection company complies with this section.
265.75/503 A Biennial Report
Has the owner/operator submitted the blennial report by March 1 of each even numbered year?
265.76 Unmanifested Waste Report (for off-site facilities only)
Facility accepts for treatment, storage, or disposal any hazardous waste from out-site source without an accompanying manifest.
If yes, has the owner or operator prepared
Comments:

Subpart F - 265.90/ R 804 Groundwater Monitoring YLS	NO
(:Applies only to: surface impoundments,	
The owner/operator has a groundwater monitoring plan capable of determining the facility's impact on the quality of the ground water. If no, explain:	= PA and EGIS
facility's impact on the quality of the ground water. If no, explain: Capability of GWM suptem is order	evaluation
There are 28 monitoring wells installed at the facility.	1
The depth to groundwater is The depth of the monitoring wells are	
	¥
Groundwater monitoring system is capable of yielding groundwater samples for analysis. If no, explain	
Monitoring wells are installed one apparatually hydraulically upgradient. Specity now many and the depth of each. (33 - w-85)	
Monitoring wells are installed nydraulically down gradient. Specify theuty could now many and the depth of each downgradient	1 <u>40</u>

·		¥	
	YES	NO	
	/		
Owner/operator has a groundwater sampling and analysis plan.			
The plan include procedures and techniques for:			
<pre>1- sample collection 2- sample preservation and shipment 3- analytical procedures 4- chain of custody</pre>	1		
The owner/operator has prepared an outline of a groundwater quality assessment program.			
Comments:			
lence GWH anoten is under eve	elua t	ion, 700	
determination can be made of white	1 10	adimeter	o not
deleganina him can it into the of where	7 23	The state of the s	
			_
Subpart G - 265.112/805 A - Closure Plan			_
Subpart G - 265.112/805 A - Closure Plan Facility has a written closure plan and keep a copy and its revisions at the facility.	<u>/</u>		
Facility has a written closure plan and keep	<u>/</u>		

3) an estimate of the maximum inventory of wastes in storage or in treatment at any given time during the life of the facility	YES	NO	
4) a description of the steps needed to decontaminate facility equipment	<u> </u>	7). 7 <u>1</u>	
5) a schedule for final closure			
6) final disposition of all wastes		. —	
Continue to the Closure Plans Checklist			
Comments: Closure Plan is order en	valuate	in of El	PA
comments: Closure Plan is inder en as part of the property Part B Permit	app	lication.	,
Closure costs estimated by PROTECO'S pe	essexue	lare	
Closure costs estimated by PROTECO's per \$ 2,099,400.00, Contingency closur	e cest	id3, 120,0	00.00
V .			
265.118/805 B - Post Closure Plan			
Facility has a written post-closure plan kept at the facility	V	 :	
This plan include and identifies: 1) Activities which will be carried on after closure and frequency of these activities.		()	
2) A description of the planned ground- water monitoring activities	~		
 The integrity of the cap and final cover or other containtment structures where applicable. 	~		
 Describe the function of the facility monitoring equipment 	~		
5) The name, address and phone number of a person or office to contact about the disposal facility during the post-closure period.	_/		
6) Written estimate of the cost of post- closure for the facility. If yes, what is it? Post closure cost for 1 yr \$48,600.00 in 30 y \$ 488,500,00			
10 30 y \$ +88, 500,00			

Subpart H - 265.140/R 808 - Pinancial Requirements YES No	
Does the owner/operator has submitted the documentation required in this section to ECB and/or EPA for evaluation. Like: Finantial documents for 1988 and 1988 fave xing 1987 and 1988 fave xing 1987 and 1988 fave xing 1987 and 1988 fave xing 1987 and 1988 fave xing 1987 and 1988 fave xing 1987 and 1988 fave xing 1987 and 1988 fave xing 1987 and 1988 fave xing 1987 and 1988 fave xing 1987 and 1988 fave xing 1987 and 1988 fave xing 1988 fa	1
Subpart I - 265.170 - 265.177/R 812 - Containers peen published to EQE	2
A. Type of Containers used: (size, type, quantity and nature of waste) e.g. 12 fifty five gallon drums of waste acetone.	
There are 665 droms (55 gallon each) stored at the	
between rows of droms. all dwas were closed, labeled.	
and in good conditions. He leaking or convided durins	
were observed.	
B. Condition of Containers (How many)	
1) Leaks	
2) Ruptures	
3) Corrosion	
4) Closed (Except on Use)	
5) Impermeable Base V Note: Earthding 6) Secondary Containment Vearth were sat in good and it	lle
6) Secondary Containment Vearth & were suit in and it	e k
7) Evident Spills	
8) Heat Pressure	
9) 50 ft. Buffer Zone (Ignitable or Reactive Waste Only)	
10) Incompatible Material Segregated in different containers, not placed in unwashed container, artificial barrier)	
11) Labels visible for easy identification	
C. Storage Area Inspected Weekly	
There were 69 containers stored over the soil without	
any secondary containtment. They also do not have any	
overhead covering to protect them from weathering.	

Subpart J - 265.190 - 265.199/R 813 - Tanks

A. Number and size of tanks containing i	nazardous waste:	
There is only one tank and	I is used to store	
Lindane. Il fas a volume of	J 7000 gal. At present as about one or two) because the Lindane of wastes for a lines compation	Silv
see above		
C. Operating Requirements		
1) Leaks		
2) Luptures	<	
3) Corresion	_	
4) -2 ft. freeboard or Secondary Containment, or Drainage Control System, or Diversion Structure		
5) Inflow Controls (if wastes is continuosly fed)	- r/A	
6) Evident Discharges		
7) Heat/Pressure		

		YES	NO	
C.	Waste Analysis/Trial Test Records (whenever tank is used to treat or store HW different from previous waste)		W/A	
E.	Tank Inspections-Check logs for:			
	 Discharge Control Equipment (waste feed cut-off, by-pass, etc.) at least once each operating day 			ix doss xit
	<pre>2) Monitoring Equipment Data (e.g. presssure, temperature) at least once each operating day</pre>			nek doss xut have and equipme monitoring
	 Level of waste, at least once each operating day 			ž
	4) Construction Materials of tank, at least weekly	\checkmark	-	ال ما
	5) Construction materials of discharge confinement structures (e.g. dikes) at least weekly		V	The area was it
F.	Ignitable or reactive waste are stored in such manner which protects them from a source of ignition or reaction		TL/A	a waser
Ex	plain:			
G.	Incompatible Wastes are being stored separate from each other. If no, explain:	V		
_				
Co	maents:			

Subpart K - 265.220/R 817 Surface Impoundments (pits, ponds, lagoons)

Approximate size of surface	· ,
impoundment (gallons or cubic feet)	there are four surface unp.
Types of waste stored and treated	There are four surface imp. at PROTE.CO. They are:
	i- one oil lagoon
	- one oil lagoon 2- Two rentralization /agoons
	3. one storm sain water basin
Operating requirements:	YES NO
1) two feet of freeboard	_
2) earth dikes have protective cover	
3) waste analysis and trial tests records	
4) evident discharges (by overtopping, dike breaching,	
wave action, etc.) If yes,	
explain:	One of the rentralization
	layons (Lf-ferric lagon) was evered (elised) on
	luopines (27
	was evered (elised) on
	January 5-12, 1986.
5) !iner(s)	
! pecity type and thickness:	. *
There is no synthetic le	rel,
leacheate collection or	detection
system in any of the	lagrons.
<i>V V V</i>	•

	115	IVO
6) evident fire/explosions that has been occurred		
If yes, explain:		
		./
		V
7) Inspections - Check logs for:		
a) freeDoaru (each day)	1	
<pre>b) surface impoundment and surrounding (once a week)</pre>		
Ignitable or reactive waste placed in the surface impoundment		u/A
If yes, is the waste treated, rendered or		
mixed before or immediately after placement in the impoundment		The /A
50 00 00 00 00 00 00 00 00 00 00 00 00 0		
Explain:		
	39 (
Resulting mixture of material no longer		
meet the definition of ignitable or reactive		W/A
waste	-	
The surface impoundment is used solely for emergencies		$\overline{\mathcal{V}}$
Incompatible wastes, or incompatible wastes		
and materials placed in the same surface impoundment		~
Comments:		

Subpart - L 265.250/ R 818 Waste Piles (solid or semisolid bulk wastes)

7/	1
1	1
(77

Quantity of waste piles Indicate size, height and types of wastes in piles		8
	YES	NO
Waste pile is protected from wind errosion Explain type or protection		
Leachate run-off from the waste piles is a hazardous waste		-
If yes:		
a- the pile is placed in an impermeable base		
D- owner/operator maintains a run-on control system		
c- owner/operator maintains a run-off management system	(:: :
d- the pile is protected from precipitation or run-on by some means		
e- no liquids or waste containing free liquids are placed in the pile	R PR i	7
Ignitable or reactive wastes are placed in piles		

T.F. was a	YES	NO	
<pre>1) Addition of waste to an existing pile</pre>	8	<u> </u>	
results in a mixture which no longer meets the definition of ignitable or reactive waste			
2) the waste is protected from any materials or condition that may cause it to ignite or react			
Piles of incompatible wastes appear to be stored separated from other wastes or materials, or protected from them by means			
of a dike, berm, wall or other devices			
Subpart M - 265.270/ R 819 - Land Treatment			
Hazardous wastes are placed in or on a land treatment facility.	- н		
Has the owner/operator design, construct, etc. a run-on control system capable of preventing flow onto the active portions of the facility during a peak discharge from at least a 25 year storm.			
Has the owner/operator design, construct, etc. a run-off management system capable of collecting and controlling a water volume at least equivalent to a 24 hour, 25 year storm.			2 5
Are collection and holding facilities associated with a run-on and run-off control systems emptied after storms to maintain design capacity of the system.		=	
Does the units is managed to control wind ouspersal (if apply)?))		
Can the waste placed in the land treatment facility be made less hazardous or no hazardous by biological degradation or chemical reaction occurring in or on the soil.	_	388	
In addition to the waste analysis required by 265.13, does the owner or operator:			
a) determined concentrations in the waste of			

	YES	110	17 /F.
any substances that cause a waste to exhib the Er toxicity characteristic	olt		
b) determined the concentrations of any substances which cause the Waste to be listed as a hazardous waste			
c) determined (if food chain crops are grown) the concentrations in the waste of each of the following constituents: arsenic, cadmium, lead and mercury			
Does the owner/operator of a hazardous waste and treatment facility on which food chain crops are grown notified the Regional administrator?			
The owner/operator has a written unsaturated cone monitoring plan			-
This plan include the following:			
.) soil monitoring using soil cores			
2) soil-pore water monitoring			-
3) depth at which soil and soil-pore water samples are to be taken	1		
 number of soil and soil-pore water samples to be taken based on the variability of constituents, soil types 			
s) frequency and timing of soil and soil-pore water sampling based on frequency, time and rate of waste application, proximity to ground water and soil permeability.		-	
Does the owner/operator include hazardous waste application dates and rates in the operating record?		• —	1
The owner/operator has developed a clusure plan to address the fullowing objectives:		•	
1) control the migration of hezardous waste and hazardous waste constituents from the			·

	YES	NO	N/A
2) control of the release of contaminated run-off from the facility into surface water	(Carana and Carana and		
3) control of the release of airborne particulate contaminants caused by wind erosion	S	1 3 	
4) compliance with 265.276 concerning the growth of foou-chain crops		-	
Are ignitable or reactive waste treated in the land treatment facility?	(C	-	
It yes, explain:			
Are incompatible wastes, or incompatible wastes and materials placed in the same land treatment area?	r <u>——</u> Tide		
If yes, explain:			
Subpart N - 265.302/806 Landfills			
Identify the types of waste and size of the landfill			
There are Live drom turial law	dills	that	•
There are live drum turial law are xut in use.	l		
			1 The Control

	YES	NO	
General Operating Requirements			
The owner/operator has designed, construct, operate and/or maintains a:		. = s [™]	
a) run-on control system			
b) run-off control system		~	
c) collection and holding facilities (e.g. tanks or basins) associated with run-on, run-off control systems that are emptied after storms		<u> </u>	0 = 1440
d) wind dispersal control system	V	The areas ar	gass.
The owner/operator of a langfill maintain an operating record which includes:			E.
 a) a map with location, dimensions and depth of each cell 	~		
p) the contents of each cell	V	-	
c) the approximate locations of each hazardous waste type within each cell		~	
Are untreated, ignitable, or reactive wastes placed in the lanufili?		$\overline{\mathcal{L}}$	
If yes, explain:			
			-
			_
			_
Are incompatible wastes, or incompatible wastes and materials placed in the same nazargous waste landfill cell?		<u>·/</u>	

A/A			
Are bulk or non-containerized liquid waste or waste containing free liquids placed in a hazardous waste landfill?	YES	NO Col the	present landfill
a) The HW landrill have a liner and a functioning leachate collection and removal system.		- Tau	ist.
waste containing free liquid waste or treated or stabilized chemically or physically.		_	
are containers holding liquid waste or vaste containing free liquids placed in the HV landfill?		_/	
f yes, the container is one of the ollowing:			
a) a very small container, such as an ampule			
b) a container designed to hold free liquids for use other than storage such as a battery		\	
c) a lab pack as defined in 265.316			
ne owner/operator use method 9095 (Paint of the Liquids Test) to demonstrate absence of presence of free liquids in either obtainerized or a bulk waste.		- /	
	YES	NO /	
mpty containers are crushed flat, areuded, or similarly reduced in plume before it is buried beheath the prince of a landfill.			
e small containers of HW in overpacked ums (lab packs) placed in the lanufill?	-		
yes, describe precautions taken to event the release of the waste		1	

Subpart 0 265.340/ R 814 Incinerator		1
Describe the type of incinerator (e.g. water wall incinerator, boiler, etc.)		/C
List of the types and quantities of HW incinerated.		
Is t residue from the incinerator a naza: ous waste?		
Describe the air pollution control devices (if any) installed in the incinerator unit.		
The operating record include additional analysis to determine types of pollutants which might be emitted including:		
a) Heating value of the waste	_	
b) Halogen and sulfur content		
c) Concentrations of lead		
a) Concentrations of mercury		
If no to any of the above statements, is there justification and documentation	-	

	YES	NO
Does it appear the incinerator is operating at steady state (normal) conditions of operation, including temperature and air flow?		- 1 N/
The owner/operator conduct the following monitoring and inspections when incinerating HW:		
 a) existing instruments related to combustion and emission controls (every 15 minutes) 		**************************************
b) complete incinerator and associate equipment (pumps, valves, conveyors, pipes, etc.) (inspected daily)	T and the second secon	-
c) emergency shutdown controls and system alarms		
u) stack plome observed visually for . opacity and color (at least nourly)	-	
The incinerator have all the following instruments for measuring:		
a) wastefeed		
b) auxiliary		
c) temperature scrubber flow	0*****	
d) scrubber pH	V ária na S t	
If no, explain:		
Is there open burning of hazardous waste?		

List the nazardous waste burned				
(only burning or detonation of explosions				
is permitted)				
		•	*	
				_
i.				
				_
				_
				_
If open burning or detonation of explosives				
is taking place, describe what is the distance	è			
from the open burning or detonation to the				
property of others.				
				_
				-
*				-
				_
				1
Subpart P - 265.370 - Thermal Treatment (for f	acıli	ties t	hat	71
thermally treat hazardous waste in devices oth	er tha	n enc	losed	11/1
devices using controlled flame combustion, e.g	· inc:	nerate	or)	15
	YES	NO	N/A	7
The control of the co				
The owner/operator bring his thermal treatment process to steady state (normal) conditions				
before adding the waste.				
,				
The waste is analyzed before treatment to		A415		
determine:		-	-	
a) heating valve of the waste			-	
b) halogen content and sulfur content		,	0	
in the Waste	-		-	
c) concentrations in the waste of lead			<u> </u>	
and mercury, unless the owner/operator has documented data to show the element				
is not present				

	YES	NU	I./A
Does the owner/operator conduct the following monitoring and inspections:	-	 .	
1) existing instruments related to temperature and emission control (every 15 minutes)	-		
2) stack plume (emissions) where present (must be observed visually at least nourly)	-		
3) the complete thermal treatment process and associated equipment (pump, valves, conveyors, pipes) are inspected at least daily			-
Is there open burning of hazardous waste at the facility?			
List the nalargous waste burned (only burning or detonation of explosions is permitted)			
If open burning or detonation of explosions is taking place, describe what is the distance from the open burning or detonation to the property of others			
,			
			5!
Does the owner/operator burn EPA Hazardous Wastes Fu2u, Fu21, Fu22, Fu23, Fu20, or Fu27 under a certification granted by the Assistant Administrator for Solid Waste and Emergency Response		-	

Subpart Q - 265.400/ R 820 Chemical, Physical Treatment	and	Biological
(other than in tanks, surface impoundments or iacilities).	land	treatment
Describe the treatment system at this facility and the types of wastes treated	12	
By visual inspection, check if the treatment process show any signs of:		
a) leaks		
b) ruptures		
c) corrosion		
The process or equipment is equipped with a means to stop the initiow of continuously-fed HW.		
The operating record include the waste analysis plan and copy of the results from each waste analysis and trial test.		
The owner/operator conduct inspections of:		
a) discharge control and safety equipment (at least daily)		
b) data gathered from monitoring equipment (eg. presssure and temperature ganges) (at least daily)		3 .
 c) the construction materials of the treatment process or equipment (at least weekly) 		

	YLS	ОИ	9
d) the construction of materials of and the area immediately surrounding discharge confinement structures (Weekly)		(20 (V)	/
Are lymitable or reactive waste fed into the waste treatment system?	2		
If yes, please explain:			
			-
Are incompatible wastes placed in the same treatment process?			
If yes, explain:			
/sec .			

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility:	Protección	Jécrica	Coligica	
IIC EDA	ID No. P	RD 091018	622	
			Bo. Jalla	
Street: City:	Pennelas	_ State: _	PR.	Zip Code: 00724
Telephone	: 836	-2123		
Operator:				
Street:				
City:	6	_ State: _		Zip Code:
Telephone	e:		у.	141
Owner:				
Street:				
City:		_ State: _		Zip Code:
Telephon			• CHINE	
Inspection	n Date: 9/2/8	Time: 10:11 P	Weather Cond	itions:
	Name		ation	
Inspector	s: Pris	cilla M.Be.	land Earl	(82.9) 722-6437
Facility	Representatives:	1.1155	Marta Her	winder Chemist
			· ·	
		RCRA Status	F-Solvent	DR Status California List
	Generator			
	Transporter			3
	Treater			V.
	Storer	/	_/_	
	Disposer			

INSPECTION SUMMARY

Devised 10-15-87

RCRA LAND DISPOSAL RESTRICTION INSPECTION APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

				Gen.	Treat	Store	Disp.	Trans.
A.	F-S	olvent Was	1es					
	1.	F001				_/		
	2.	F002		-		_/		-
×	3.	F003				/	· 	
	4.	F004					-	
	5.	F005						
		Note:	Use Appendi:			ther the fa	cility is	

B. California List Wastes

 Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat .	Store	Disp.	Trans.
Arsenic	500 mg/L		. .			
Cadmium	100 mg/L					-
Chromium VI	500 mg/L		-			
Lead	500 mg/L					
Mercury	20 mg/L					
Nickel	134 mg/L				·	
Selenium	100 mg/L					
Tha!lium	130 mg/L					:

2.	Liquid hazardous any solid or sludg concentrations gr	ge) that	contains fr	ee cyanid	es at	d with	
			Gen.	Treat	Store	Disp.	Trans.
3.	Liquid hazardous	waste t	hat has a p	H of less	than or eq	ual to 2.0	
4.	Liquid hazardous than or equal to Does the fa contains PC	50 ppm 500 pps cility mi Bs with	m ix liquid has other type Yes	azardous v	waste that	NA	<u> </u>
5.	Liquid hazardou greater than or o than 10,000 mg/ Note: The prohi waste is also sub specific HOC.	equal to L	1,000 mg/L of 268.32(a)	(dilute F	OC waster	oply if the	—— —— HOC

RCRA LAND DISPOSAL RESTRICTION INSPECTION GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

	F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?
	Yes No NA
	If yes, check the appropriate treatability group.
	 Wastewaters containing solvents (less than or equal to 1% TOC by weight) Pharmaceutical wastewater containing spent methylene chloride All other spent solvent wastes
2.	California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?
	a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?
	Yes No NA
	If yes, specify the method:
	b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?
	Yes No NA
	If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

				GEN
В.	Was	te An	nal <u>ysis</u>	
	1.	F-S	olvent Wastes	
		a.	Does the generator determine whether the F-solvent waste exceeds treatment standards?	
			Yes No NA	
			How was this determination made?	
			- Kno ledge of waste	
			YesNo	
			If yes, note how this is adequate:	
			TCLP	
			- TCLP Yes No	
			If yes, provide the date of last test, the frequency of testin and note any problems. Attach test results.	g,
				-
		b.	Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?	
			Yes No NA	
			If yes, specify the waste stream:	
		c.	Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?	
			Yes No NA	
		d.	How does the generator test F-solvent waste when a process or waste stream changes?	
	2.	Cal	ifornia List Wastes	
		a.	Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) a described by SW-846?	ıs

NA

Yes

__ No

b.	If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?
	Yes No NA
	What type of absorbent is used? Check the types of waste to which absorbent is added. Liquid hazardous waste having a pH less than or equal to 2
	Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L
	Liquid hazardous waste containing metals
	Liquid hazardous waste containing free cyanides
c.	Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:
	- Knowledge of wastes
	Yes No NA
	If yes, note how this is adequate:
	- Testing
	Yes No NA
d.	If yes, list test method used: Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?
	Yes No NA
	- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels:
e.	Does the generator dilute the waste as a substitute for adequate treatment [268.3]?
	Yes No NA

C.	Man	agem	<u>ent</u>
	î.	On-S	Site Management
			aste that exceeds the treatment standards treated, stored, isposed on-site?
			Yes No
		If y	es, the TSD Checklist must be completed.
	2.	Off-	Site Management
		a.	Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?
			Yes No
			If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?
			Yes No
			If yes, does not fication contain the following?
			EPA Hazardous waste number(s) Yes No
			Applicable treatment standards Yes No
			Manifest number Yes No
			Waste analysis data, if available Yes No
			Identify off-site treatment or storage facilities:
		b.	Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?
			Yes No
			If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?
			Yes No

	If yes, does notification contain the following	owing!	
	EPA Hazardous waste number(s)	Yes	No
	Applicable treatment standards	Yes	No
	Manisest number	Yes	No
	Waste analysis data, if available	Yes	No
	Certification that the waste meets treatment standards	Yes	No
	Identify off-site land disposal facilities:		
c.	If the waste is subject to a nationwide v (e.g., solvent-water mixtures less than 1% (268.5), or petition (268.6), does the gene provide notification to the off-site disportant the waste is exempt from land disportant restrictions [268.7(a)(3)]?	6), extension rator osal facility	p
	Yes N	0 1	NA.
(i.e., boi	nt Using RCRA 264/265 Exempt Units or I lers, furnaces, distillation units, wastewater ent tanks, elementary neutralization, etc.)	Processes	
(i.e., boi treatme	lers, furnaces, distillation units, wastewater ent tanks, elementary neutralization, etc.) e treatment residuals generated from units der RCRA 264/265?	Processes r or processes ex	
(i.e., boi treatme	lers, furnaces, distillation units, wastewater ent tanks, elementary neutralization, etc.) e treatment residuals generated from units	Processes r or processes ex	
(i.e., boi treatme Ar un	lers, furnaces, distillation units, wastewater ent tanks, elementary neutralization, etc.) e treatment residuals generated from units der RCRA 264/265?	Processes r or processes ex	

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

A.	Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?
	Yes No
	If yes, check the appropriate regulatory status: Interim status for storage RCRA permit for storage
	If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:
В.	Does the transporter mix, combine, or recontainerize wastes?
	Yes No
C.	Is the waste treated in an exempt treatment process on-site?
	Yes No

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

	uirements [264.13 or 265.13]?
	F-solvent Yes No NA
0 (California List Yes No NA
Do	es the facility obtain representative chemical and physical analyses of stes and residues?
	Yes No
a.	What date was the waste analysis plan last revised? _ Congrect 7, 1
•	
b.	Are analyses conducted on-site or off-site?
D.	Identify off-site lab: E.G. Labs, Dic-
с.	On-site Off-site
100.00	Identify off-site lab: E.G. Labs, Dec.
100.00	On-site N Off-site Identify off-site lab: E.G. Labs, Enc.
c.	Identify off-site lab: E.G. Labs, Dec.

Stor	age (268.50)
1.	Are restricted wastes stored on-site?
	Yes No
	If no, go to C, Treatment in Surface Impoundments.
2.	If yes, check the appropriate method.
	Tanks Containers
3.	Are all containers clearly marked to identify the contents and date(s) entering storage?
	Yes No NA
	Contains are marked with the has muste label, content is identified but not the date entering storage at the TB facility. Date where struge is recorded in the log book.
4.	Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?
	Yes No
5.	Do operating records agree with container labeling?
	Yes No NA
6.	Have wastes been stored for more than I year since the applicable LDR regulations went into effect?
	YesNo NA
	If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal? Yes No
	5
	If yes, state how:

В.

7	Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?
	Yes NoNA
	If yes, do the ope ating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?
	Yes No
8.	the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?
	Yes No NA
C. <u>Tr</u>	eatment
1.	Does the facility treat restricted wastes other than in surface impoundments?
	YesNo
	If no, go to D, Treatment in Surface Impoundments.
2.	Describe the treatment processes:
3.	Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]?
	Yes No
4.	Describe frequency of testing treatment residuals:
5.	Is dilution used as a substitute for treatment?
	V

6.	Are notifications prepared by the generators kept in the facility's operating record?
	Yes No
7.	Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?
	Yes No NA
	If yes, does the treatment facility provide notification and certification to the disposal facility?
	Yes No
	If yes, does notification contain the following?
	EPA Hazardous waste number(s) Yes No
	Applicable treatment standards Yes No
	Manifest number Yes No
	Waste analysis data, if available Yes No
	Certification that the waste meets the treatment standards Yes No
	Identify off-site disposal facilities:
Tres	elment in Surface Impoundments
1.	Are restricted wastes placed in surface impoundments for treatment?
	YesNo
	If no, go to E, Land Disposal.
2.	If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

D.

3.	11177	the minimum technology requirements have not een met, has a waiver been granted for that unit?
		Yes No
4.	ac	om the surface impoundment tested separately, ceptably, and in accordance with the sampling frequency d analysis specified in the waste analysis plan?
		Yes No
	Αt	tach test results.
5.	Do	the hazardous waste residues (sludges or liquids) ceed the treatment standards specified in 268.41?
		Yes No
6.	Pro	ovide the frequency of analyses conducted on treatment
	8=11-	
7.	Do of	es the operating record adequately document the results waste analyses performed in accordance with 268.41?
		Yes No
8.	tre	the hazardous waste residues that exceed the atment standards (268.41) removed adequately and an annual basis?
		Sludge Yes 'No
		Supernatant Yes No
	2.	If no, and supernatant is determined to exceed treatment concentrations, is annual volume of liquid flowing through the impoundment greater than the impoundment volume?
		Yes No
	b.	Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?
		Yes No

		i	mpoundment?
			Yes No
		d. A	Are residues treated prior to disposal?
			Yes No
		I	f yes, are waste residues treated on-site or off-site?
			On-site Off-site
		10	dentify treatment method:
		_	
	*	_	
E.	La	nd Dispos	<u>al</u>
	1.		tricted wastes placed in land disposal units such as is, surface impoundments waste piles, wells, land treatment alt domes/beds, mines/caves, or concrete vault or bunker? Yes No
		Note:	Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.
		If yes, s	pecify which units and what were
	2.	Does the	e facility operating record have notices and certifications from prs/storer/treaters [268.7(c); 268.7(a),(b)]?
			Yes No
	3.	Does the to the w applicab	facility obtain waste analysis data or test the wastes (according aste analysis plan) to determine that the wastes comply with the le treatment standards [268.7(c)]? Yes No
		If yes, a	t what frequency?
) 	

4	If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no extension [268.6], an approved case-by-case capacity	TSD
	Yes No	
5.	Does the facility dispose of restricted wastes that are subject to a	
6.	Yes No If yes, are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection)? Yes No Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?	
7.	Yes No NA What is the volume of the restricted wastes disposed of to date?	
8.	If the facility has a case-by-case extension, is the facility making progress as described in progress reports?	
	Yes No NA	

If the waste stream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste. For example:

50%	xylene	(F003)
12%	TCE	(F001)
38%	mineral	spirits
100%		

If in light of the above, the handler appears to be generating F001 - F005 hazardous wastes, refer this facility to the enforcement official for followup actions verifying the use of solvents at the facility.

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TSD NAME	TYPE OF			
LOCATION	FACILITY	WASTE	WASTE	COMMENTS (shipment dates.
EPA 1D NO.	T/D METHODS	COOE	QUANTITY	Waste descriptions, etc.)

Exhibit #3

Proteco Pont A Applications

Fred C. Hart Associates, Inc.



Alexa fin find

December 24, 1985

Mr. Stanley Seigel U.S. Environmental Protection Agency Region 2 26 Federal Plaza New York, N.Y. 10278

Re: PROTECO Part A Application

Dear Mr. Seigel:

On behalf of PROTECO, we are forwarding one signed copy of an updated Part A Application which reflects the latest management staff and current status of regulated units at the facility.

Should you have any questions, do not hesitate to call.

Very truly yours,

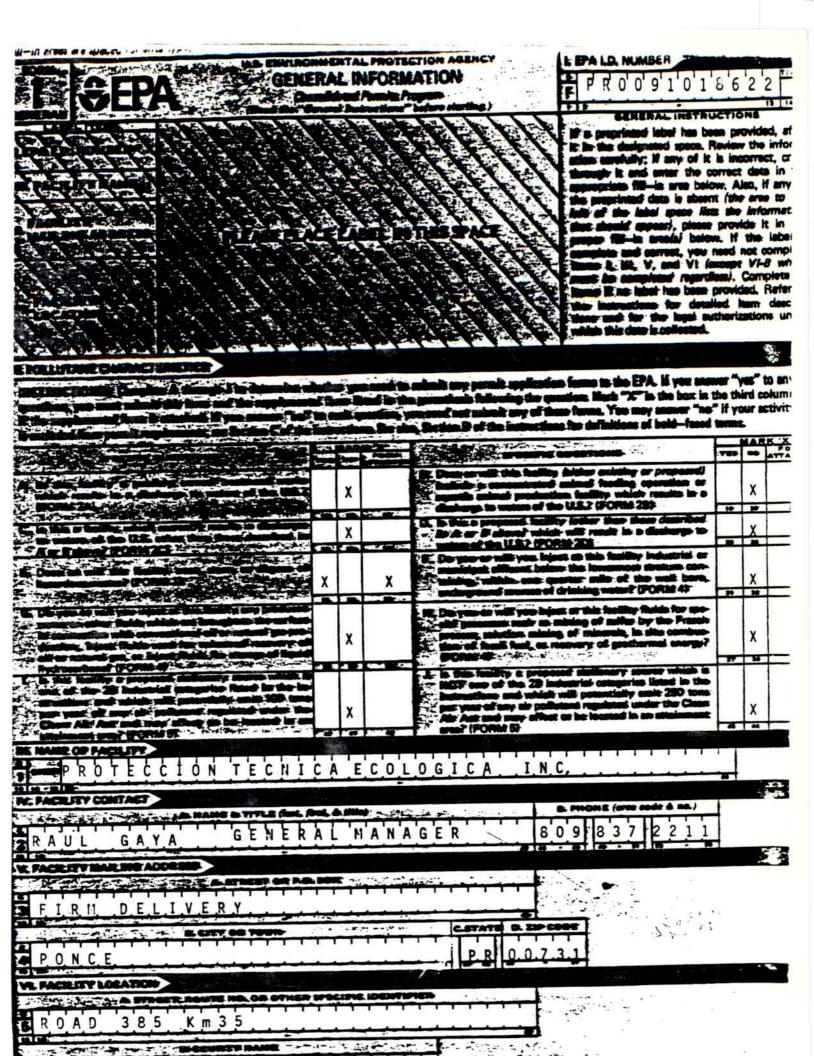
FRED C, HART ASSOCIATES, INC.

Gary R. Brown, P.E.

GRB/dg

cc: J. Gorman

(B511)



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	75-12-19	- 5 6 Puerto Rico Planning Board
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Treatment, storage and disposal of hazardous and non-hazardous waste from various manufacturing plants in Puerto Rico.

CERTIFICATION (see instructions)

ertify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all schmants and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the lication, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting a information, including the possibility of fine and imprisonment.

LME & OFFICIAL TITLE (type or print)

orge J. Fernandez, President

Jerg Francis Son

C. DATE SIGNED

FORM	
4	W-PA
RCRA	VB , 1

HAZARDOUS WASTE PERMIT APPLICATION Consolidated Parmits Program

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4.72 (TI3)

DESCRI	TION	OF	HAZA	RDOUS	WASTES

EFA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous wests you will handle. If you randle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteris-

ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual sesis. For each characteristic or toxic conteminant entered in column A estimate the total annual quantity of all the non-listed weste(s) that will be handled

JNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate

ENGLISH UNIT OF MEASURE CODE METRIC UNIT OF MEASURE POUNDS...... CODE KILOGRAMS.....K

f facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into

ROCESSES

. PROCESS CODES:

For listed hezardous waste: For each listed hezardous waste entered in column A select the code/s/ from the list of process codes contained in Item III to indicate how the weste will be stored, treated, and/or disposed of at the facility.

For non-listed hecardous westes: For each characteristic or toxic conteminent entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess

Motes: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

- . PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.
- E: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER Hazardous wastes that can be described by s than one EPA Hazardous Waste Number shall be described on the form as follows:
- . Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the weste and describing all the processes to be used to treat, store, and/or dispose of the wests.

 In column A of the next line enter the other EPA Hezardous Waste Number that can be used to describe the wests. In column D(2) on that line enter
- Repeat step 2 for each other EPA Hazardous Weste Number that can be used to describe the hazardous waste.

MPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treet and dispose of three non-listed wastes. Two wastes corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

H	A. EPA HAZARD.		RD.		C. UNIT	:	D.			. PROCESSES						
(enter code)			QUANTITY OF WASTE	SURE (enter code)		1. PROCESS CODES (enter)					er)	ODE	:5		2. PROCESS DESCRIPTION (If a code is not entered in D(1))	
K	0	5	4	900	P	T	0	3	D	8	0	1	1	Γ	7	
D	0	0	2	400	P	T	0	3	D	8	0	Т	1		7	
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DESCRIPTION OF HAZARDOUS WASTES (continued)

OPERATOR CERTIFICATION

duding the possibility of fine and imprisonment.

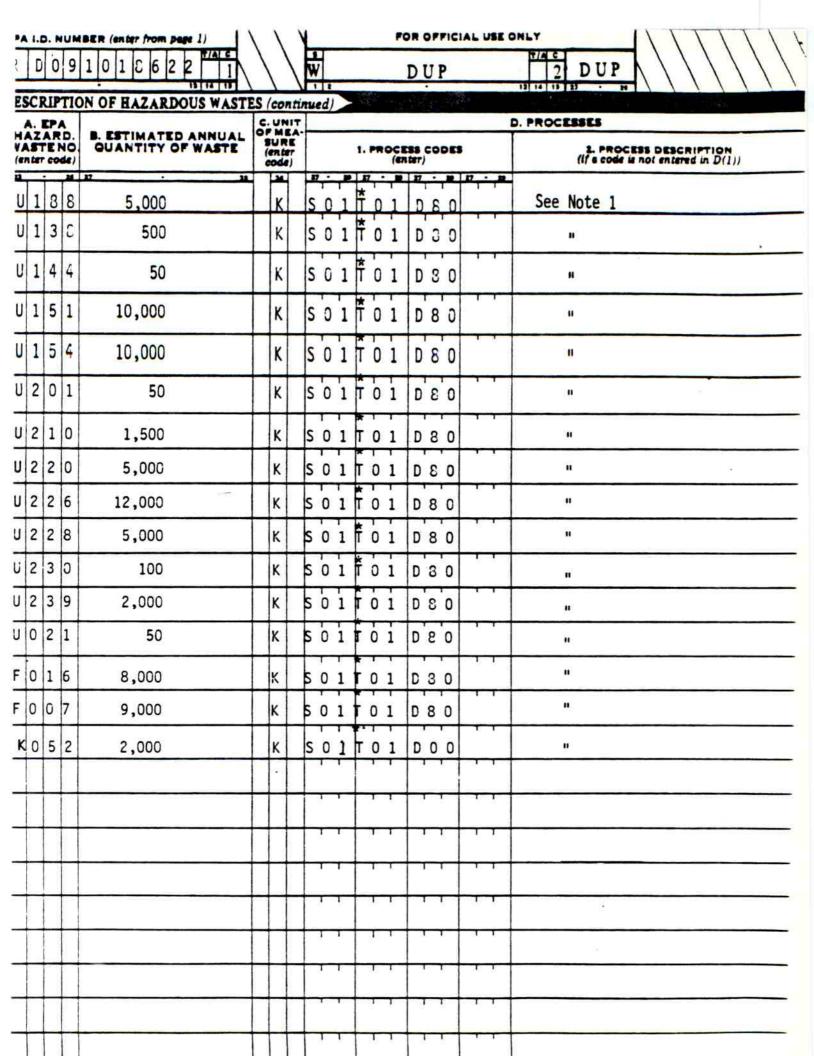
USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

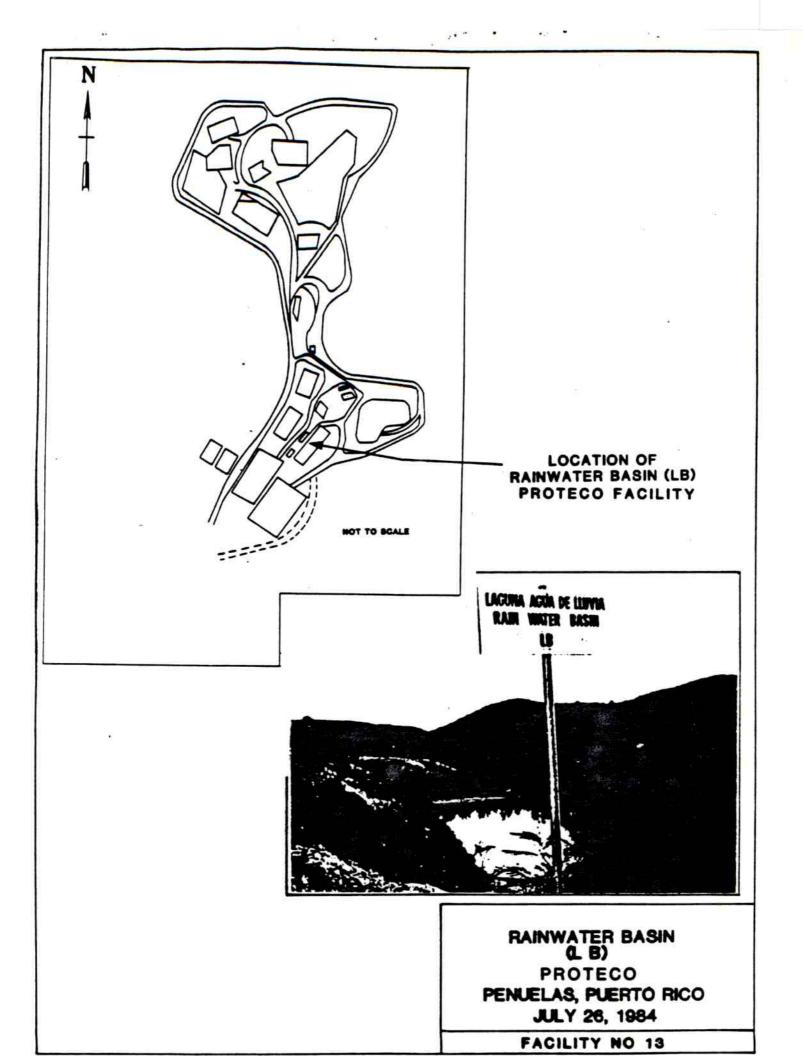
Note 1: The only wastes from this list entering units LB and TI3 are from spills, spill residues and liquid decanted from the oil lagoons (LA, Unit No. 9).

EPA I.D. NO. (enter from page I)			*:		
PRD091018622 746					
12 14 12					
FACILITY DRAWING					and the second
excisting facilities must include in the space provid	led on page 5 a scale drawing of	the facility (see instruction	s for more d	e tail)	
PHOTOGRAPHS					
existing facilities must include photographs atment and disposal areas; and sites of future					
. FACILITY GEOGRAPHIC LOCATION	-	100	10 P		
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OWNER CERTIFICATION					
ertify under penalty of law that I have person cuments, and that based on my inquiry of the smitted information is true, accurate, and con- cluding the possibility of fine and imprisonm NAME (print or type) Lucas P. Valdivieso	hose individuals immediatel omplete. I am aware that th	y responsible for obtain	ing the info ties for subi	rm a nitti	tion, I believe that the
(20)	////				/ /

ertify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached cuments, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the omitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information,

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NO UNDERGROUND INJECTION WELLS AT FACILITY.

EXISTING FACILITY

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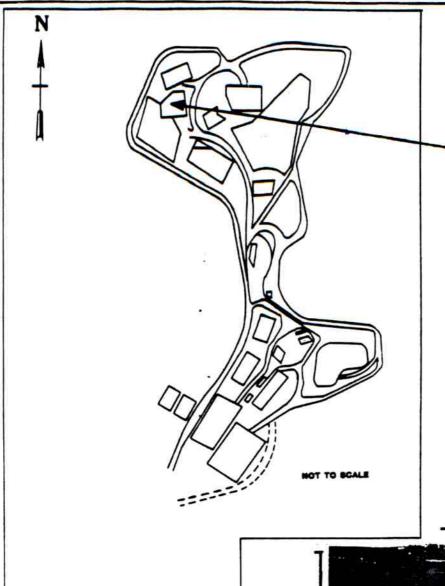


QUADRANGLE LOCATION

PEÑUELAS, P. R. N1800-W6637 5/7 5

1972

PART A
LOCATION OF
SERVICIOS CARBAREON, INC.
PENUELAS, P.R.

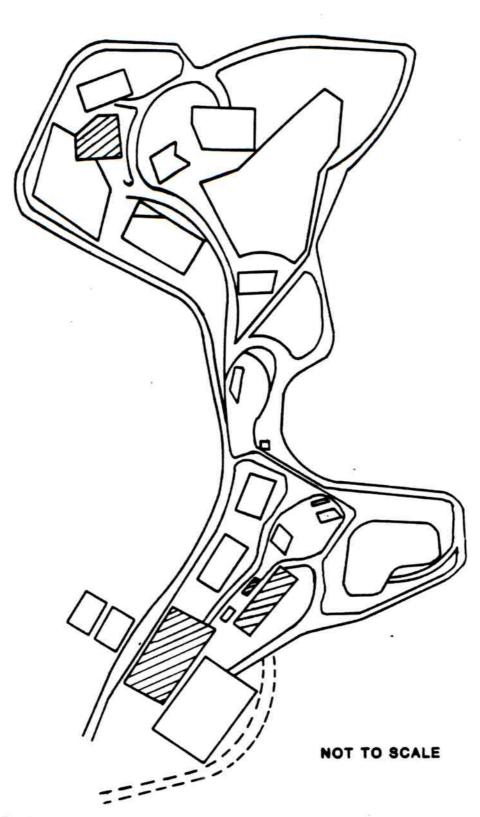


-LOCATION OF DRUM STORAGE AREA, PROTECO FACILITY



DRUM STORAGE AREA (D E) PROTECO PENUELAS, PUERTO RICO JULY 26, 1984





REGULATED HAZARDOUS WASTE UNITS

REGULATED HAZARDOUS
WASTE UNITS COVERED
IN THIS PART A APPLICATION

PART A
FACILITY DRAWING

Exhibit ## Certificate of insurance

1-2-3661

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SHOULD BY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EMPLATION DATE THEREOF. THE ISSUING COMPANY WILL EMPLAYOR TO MAIL 60 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OF LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OF REPRESENTATIVES AUTHORIZED REPRESENTATIVE

ARCETA & COMBAS INSURANCE AGENCY, INC.

Exhibit # 8

Financial assurance and Mahlity



February 7, 1989

ENVIRONMENTAL PROTECTION AGENCY REGION II 26 FEDERAL PLAZA ROOM 1000 NEW YORK, N.Y. 10278

ATTN: MR. TOM MOI

Dear Mr. Moi:

Pursuant to your request this is a status report about our efforts to acquire the necessary financial assurance to cover non sudden occurences and the Certificate of Insurance (include General Liability and Automobile Liability).

If you have any question don't hesitate to call us at 721-4382.

Cordially yours,

Ivelisse Estrada Marketing Director

cc: Mr. Steve Gordon

Enclosure



CERTIFICATE OF INSURANCE

This is to Certify, that policies in the name of

NAMED INSURED and ADDRESS PROTECCION TECNICA ECOLOGICA CORP. (PROTECO)
AVE. HIPODROMO #614 PDA. 20
SANTURCE, P.R. 00909

THIS CERTIFICATE OF INSURANCE NEITHER AFFIRMATIVELY NOR NEGATIVELY AMENDS, EXTENDS OR ALTERS THE COVERAGE AFFORDED BY ANY POLICY DESCRIBED HEREIN.

are in force at the date hereof, as follows:

INCHDANCE	POLICY Number	POLICY PERIOD		ITS	
INSURANCE	3101112111	Eff.	Workmen's Compensation Ins.	STATUTORY	
ORKMEN'S COMPENSATION AND EMPLOYERS' LIABILITY		Exp.	Employers' Liability Ins.	s	
(III)			BODILY INJURY csl	PROPERTY DAMAGE	
COMPREHENSIVE GENERAL	SMP-310115	Eff. 9-2-88 Exp.9-2-89	\$ 1,000 .000 Each occurrence \$ 1,000 .000 Aggregate	\$ 1,000 ,000 Aggregate	
MANUFACTURERS' AND		Eff. Exp.	\$, 000 Each occurrence	\$, 000 Aggregate	
CONTRACTORS' LIABILITY OWNERS', LANDLORDS'		Eff.	\$, 000 Each occurrence	\$, , 000 Aggregate t	
AND TENANTS' LIABILITY CONTRACTUAL		Exp.	\$, 000 Each occurrence	\$,000 Each occurrence \$,000 Aggregate	
LIABILITY		Exp.	csl		
AUTOMOBILE LIABILITY Owned Automobiles Hired Automobiles	m 0007	Eff. 9-2-88 Exp.9-2-88	\$1,000 ,000 Each person \$1,000 ,000 Each occurrence	1	
Non-Owned Automobiles COMPREHENSIVE AUTO-	TP-0007	Eff. Exp.	\$,000 Each person \$,000 Each occurrenc	\$, 000 Each occurrenc	
MOBILE LIABILITY		Eff.			
OTHER:		Exp.			

t Aggregate not applicable if Owners', Landlords' and Tenants' Liability Insurance excludes structural alterations, new construction and demolition.

In the event of any material change in, or cancellation of, said policies, the undersigned company will endeavor to give written notice to the party to whom this certificate is issued, but failure to give such notice shall impose no obligation nor liability upon the company.

Dated: 1-31-89

CERTIFICATE ISSUED TO:

ARIETA & COMBAS INSURANCE AGENCY, INC.



CERTIFICATE OF INSURANCE

This is to Certify, that policies in the name of

NAMED INSURED and ADDRESS PROTECCION TECNICA ECOLOGICA CORP. (PROTECO) AVE. HIPODROMO #614 PDA. 20 SANTURCE, P.R. 00909

THIS CERTIFICATE OF INSURANCE NEITHER AFFIRMATIVELY NOR NEGATIVELY AMENDS, EXTENDS OR ALTERS THE COVERAGE AFFORDED BY ANY POLICY DESCRIBED HEREIN.

are in force at the date hereof, as follows:

KIND OF	POLICY	POLICY PERIOD	LII	AITS	
INSURANCE	NUMBER	Eff.	Workmen's Compensation Ins.	STATUTORY	
NORKMEN'S COMPENSATION AND EMPLOYERS' LIABILITY		Exp.	Employers' Liability Ins.	\$	
AND EMILOTERS EMBLETT			BODILY INJURY cs	PROPERTY DAMAGE	
COMPREHENSIVE GENERAL	SMP-310115	Eff. 9-2-88 Exp.9-2-89	\$ 1,000 .000 Each occurrence \$ 1,000 .000 Aggregate	\$ 1,000 ,000 Aggregate	
LIABILITY MANUFACTURERS' AND	Dill 310111	Eff.	\$, 000 Each occurrence	\$, 000 Aggregate	
CONTRACTORS' LIABILITY OWNERS', LANDLORDS'		Exp.	\$, 000 Each occurrence	te \$,000 Each occurrence \$,000 Aggregate 1	
AND TENANTS' LIABILITY		Exp.	\$, 000 Each occurren	ce \$,000 Each occurrence	
CONTRACTUAL LIABILITY		Exp.	csl	\$, 000 Aggregate	
AUTOMOBILE LIABILITY X Owned Automobiles X Hired Automobiles		Eff. 9-2-88 Exp.9-2-88	\$1,000 ,000 Each person \$1,000 ,000 Each occurren		
Non-Owned Automobiles COMPREHENSIVE AUTO-	TP-0007	Eff.	\$,000 Each person \$,000 Each occurrer	\$, 000 Each occurrenc	
MOBILE LIABILITY		Exp.	\$,000 Each occurren		
OTHER:		Eff. Exp.			

[†] Aggregate not applicable if Owners', Landlords' and Tenants' Liability Insurance excludes structural alterations, new construction and demolition.

In the event of any material change in, or cancellation of, said policies, the undersigned company will endeavor to give written notice to the party to whom this certificate is issued, but failure to give such notice shall impose no obligation nor liability upon the company.

Dated: 1-31-89

CERTIFICATE ISSUED TO:

ARIETA & COMBAS INSURANCE AGENCY, INC.



SOUTH CONTINENTAL INSURANCE AGENCY, INC.

Tetuán 252, El Viejo San Juan | Apartado 6022, Estación Viejo San Juan, P.R. 00905

Teléfonos: (809) 721-7600 723-1279

Teletipos: RCA 3252570 Facsimile-723-9189

ANGELA WEYNE Presidente

February 1, 1989

DR. JORGE FERNANDEZ PROTECO Calle Hipodromo Santurce, Puerto Rico

PROTECO

Dear Jorge:

Enclosed please find letter from American International Insurance Company of Puerto Rico answering our inquiry as to the status of our submission.

Cordially

AW: nb

- . American International Inturance Co. of P.R.
- Corporación Insular de Seguros Eagle Star Insurance Company of Puerto Rico
- . National Life Insurance Company . Professional Underwriters Insurance Co. . The North River Insurance Co.

Universal Insurance Company

. The Hartford Steam Boiler Inspection & Insurance Co. The Royal Insurance Company of Puerto Rico, Inc. . United States Fire Insurance Co.

FACSIMILE ROUTE SHEET

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January 31, 1989

Mrs. Angie Weyne South Continental Insurance Agency PC Box 6022 San Juan. Puerto Rico

Res PROTECO ELL

Dence Angle:

I refer to our telephone conversation of last Priday.

I spoke to the pollution underwriter in charge of reviewing this account to find out the latest status. The underwriter advised me that her analysis of the additional information sent by you will be completed and a decision rendered on the acceptability of the account during the second week in Pebruary.

Angle, as soon as I hear from New York, I will advise

Yours sincerely,

Paul Grimes

LMAI

cc : Adriese Atwell Pollution Department, New York Exhibit # & hazardon Want inventory

I brand Wes alers: Processing Francis was te woste type tt Drums CARA 9/19/85 Flore mobile liquid Nos Dool 61 HT WH I may to Gook Inc 6/10/16 F003 12 watermer to ulst F001, P001 formalin Laboration Courses 3 D001 · Comman Intole Monnocontract 4/1/67 Weste isomogramul DO01, U00 2 2 P. W. 11, Congrette 1/4/8/ Hisardons waste liquid Nos. FUOI 10 Flammable liquid N.O.S. Agenst Marth Dool, Do10 Pagen Colo Memolatoring (Pocts) Doo1, 4154 the law or 6.15 Marzardous Woste light Nos. -001 pro 611 Toxan islandered on 1420/81 Hommoble liquid N.O.S. K 052 12 744 Storage Technology 4/85 waste Point 0001 05 FR 9(29(87 Mozardous weste liquid D008 D001 100,000 m_{it} When the teamse Ind of 1487 Flammable liquid No.s. DOOI, FOOI, DOOB Listed & Examineration 11/5/27 17 (Ins-Pacts) D001 4 1/2/27 Harmitales (las-Packs) Incomment Magnetic 45/87 486 0/1/86 (27/87 No /87

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10001

C. L. L. (IBR-Packs)

ALKALINES

AND Toxics area:

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San Juan	Texaco P.re	a de de de de de de de de de de de de de	1.200	
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C.200	Peps; cola Manufecturing	(LOS -) Hozordow, weste light +	Salid was	t-
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Sun German	Iolab Pharmacantical	u(F/M theer down works by + sold	w.u.z	
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coyey		D . /)	tona,	

Centro Médico (Los-Packs) "

Rio Piedros

acid	or	Corrosives	CPH S	. (,)	aveu
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ocation	Generator Name	waste	waste 19pe	in the t
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WITTOUS	Hospitales (Lab-Packs)	1.360 2	6.
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Generator Dame	waste type	manifiest No.	Date
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est Electronics - AGUAdilla	Fool, Doo8, Dool - Flam. liquid	00001	8/4/87
nformation Magnetic - maca	Foo3 waste mathenal	8700 Z	8/26/87
m	FOOS whate Mathyl-dl	87001	4/23/87
utron Humacow	Fool Flow. liguid	0000	2/3/87
estinghouse - Tou Boja	Fools Hez. Westeli juid	038 (return	to Generator on }
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neormata Mognetics-Moca	FOOZ (Phenol + Dich	nixture: 00002	3/11/86
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Proteco 1/23/89. Penula P.R.

Norbert Bolda, General Manager. (809) 836 - 2123

Note - (Coys.)

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Dak	Waste Type	WPS	Manifest .	3) ynitable Amunt 170#	Area.
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Date	Generator V	Waste TYDE	STORAGE AREA
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7	4	D002	A,
U	4	DOO1, U154, U002 U220, U188	
FEBRUA	ARY 1988	(A.1	
2/2/88	ESC Madardo Carrazo	D002, UISI,	A
1	n	D002,	A.
N	V	D001, U002 U044, U165	Ä
2/3/88	ESC Sec. Unidad Rafael Cordero	D001	Α,
		Dooz	A.
2/16/88	Pepisi Cola Cidra	D007	A, A,
4	n	0002	A,
2/19/88	Lytron Electronic		A_1 ?
MARCH	-		
3/3/88	ESC Dr. Jose M. Kazar a Carolin	DOOD, A	1
4	7	D002 A	
n	V	D001 A	(

Date	Generator Name	Waste	Area
3/17 3/7/88	ESC Carmen B. Vieja	D002	A,
3/16/88	Hospital Regional Jose N. Gandara - Ponce	D00 2	A,
11	N, Guilland - Fonce	0001	A.
11	11	D007	A,
3/17/88	4	p002	A,
	4	P001	A,
	4	D002	A
3/18/88	"	0000	A,
	6	0001	A
	"/	D007	A
3/21/88	Information Magnetics Curib	D005	A,
1	,	0007	A`,
"	11	D002,00	07 A,
"	4	F003	A,
"	"	D001	A,
April	No hazardow waster		
4/ 188			
Hay			<u> </u>
5/10/88	VSI P.R. Inc. Ponce	D008	A_{i}
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	& My Wall	(8)	/
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Date	Generator Name	Waste	Area
5/24/88	Escuela Superior Dr. Pila Ponce	D002	A,
n	<i>U</i>	1001	Ä
5/25/88		Dans	A,
07 43700	Escuela Lola Rodriguez de Tio San German	0002	A,
1) 1)		2001	A
5/27/88	Escuela Dr. Jose Gándora Albonito	D001 U144,D0	DA A
n	Alborito	Dool,	A,
6/1/84	Esc. Antonio R. Balcelo -	D002	A,
	Esc. Antonio R. Balcelo - Culebra P.R.	DOOL	Α,
6/3/88	Esc. Jose Celso Barbosa	D001	A, A,
	Aibonito, P.R.	DOOZ	Α,
6/6/8+ E	sc. S.U. La Plata	POOL	A,
	Albonito, R. R.	D002	A,
6/2/82	Esc Escuela Su. Quebrada.	Dovz	A,
	Honda - San Lorenzo	٥.	A,

11: 12:5

-88 Digital Quipment Corp - Agra -88 Mennien de P.R Las Piedro -88 Esc. Josi Colso Barbosa - Aibonit	3000 gal. 8500 gal. 18165	Acid Liguid No.0.5. Flammable liquid NO.5. NTP 51.13gi Process Water Howardons works solution No.5. Flammable Liguid N.O.5. Flammable Liguid N.O.5.	Dooz Dooz Dooz Dooz Dooz
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Almacen de Distrito Depto Insl. Pública 6/9/85 Sun Lurenzo A, Arbrook MFG corp - Casuas Fepsi Cola MFG Co Cidra 6/14/85	23 165 3 gal 6 165 3,500 gals 5 Dm 6 Dm	Acid Liquid N.D.S. Howardons waste solid riquid was Acid Liquid N.O.S. Flammable Liquid N.O.S. Carbon Slurry Potassium Bluzoate Caffeine anhydrous Sodium Benzoate	0002 2002 2002 2002 NIA NIA NIA NIA
E Pepsi Cola Manufacturing - Caguas 6/15/88 8 Escuela superior Las/5/8/clas - Ponce 3 Io labs Pharmaceuticals - San	Drum DM DM DM DM DM DM DM DM DM D	Citric Acid Sodium Socharin Potassium Benzoate Caffeine anhydrous Sodium Chloride Sodium Benzoate Citric Acid Hazordous waste solid + liquid Mis Flammable Liquid Nos.	Nia V202 Nia Nia Nia Nia Nia Nia Nia Nia
1 Loubs thermadeuticals-San	1100	Flammable liquid N.O.S.	D001 P

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	us Dm	citric Acid	NIA	
	1 Dm	ERA	NIA	
-88 Syltron lighting Inc - Luguillo	15 DW	Sludge		
De F. K. LTD - Junios	8500	Proceedings	NIA	
88 Crown Long & Seal - corolina	3043	Process Water	MIA	
EE Hennen det. P Juncos	8,500	WIF Sludge	NIA	
EE Esc. Juan J. Osuna - Saguas	I .	Process water	NIA	
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ES Manuel del Valle Inc - Carolina	14 Dm	Diammonium Phusphate	NIA	
ALC O I ALL	400 B-5	ammonium Bicorbonate	NIA	
Alfonsi Costas Markiner H.S Maunabo	112165	Hazardous waste splid pliquid Nos.	Doo 2	K
6/27/88	5 P+	Flammable liquid N.O.S.	D00/	ŕ
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manuel Del Valle Inc - Carolina.	13 Dm	Diammonium Phosphole	NIA	ľ
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E Academia Sata Maria, Porce	80165	Horardous weste solid + lighted	D002	P
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BE Crown Cort & Sed. Inc - Grolina BB FIFT. Aguitte BB Life Sovers - La Piedras FREPH, Hyunta	1640 P	Lactose Monshydrate Hydrochloro Thiazide CIMETIDINE Tagame Capsulas racias de gel WIF sludge WIF sludge glieurine + licosyne WIP sludge Corrosine = lid Mais.	N/A NIA NIA NIA NIA Fies
PIOCS FILEPA - Aguirre LILIL Pulver P.H., In Naguobo Digital Equippent, Son Forman Alberto Culver - Naguabo Menran F.K. LTD - Jens.	1640 P 320 P 9000 9L 154 9 500 9 500 9 370 M 2100	Coste Iso- / Mohol 1,1,1-TRICHMENT MATER Process waste water WTP Shudge Process WHST Water SPENTOIL STEAM MATER DIEZEL WITH WATER AND DITT Process waste water Waste Speed stick Deadent Waste I rotalent glycul Process waste water	0.20 0.20 N/A N/H N/H N/H N/H N/H N/H N/H

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-68	Arbicok MFG corp- Coguas	1/2-1	1201 11 801 9 WOOS	Doos
& &	PREPA - AGUITTE	8,500 9	Process water	NIA
28	United Gabid Cool	88 43	WTP Sludge	NIA
	union Grbide Grafto - yabucoa	11 Bag	waste Kawool	NIA
£'	Pis n = #a	6,5-43	Worste asbertos	1
F.:	PRUPIL Againe	1544	WTP SHAP	Win
	BRF Estes Co.	74 bre.	Placetor	NIA
1		· b w.	(c) by (poor)	h iri
		Cham		h A
	~ 0	3 0 00	Graph direction	V.11
-48	Yabucoa Smoil co		Man . Ada the cody	101 19
	stes & Amount Renda	3273	Sand	NIA
t	Price as Assure	37	WIP SIND	NIA
te 1	Alberto Culver P.R. Inc - Naguabo	4/1/3	WIL SERVE	16 173
ન સંદે	PREPA- Aguirra	7500 9	Process waste water	NIA
- 86	SKE Internal Col	6643	WTP Sludge -	NIA
	SKF Labs Co Cidra	II DM	Phash	NIA
- 1		8 DM	Trian Terene (Dyazide)	10 N
er	1.1	IDM	Gactose Monshydrate	NA
	4 (704	Hud cook has The	NA
1		8 DM	Hydrochloro Thiquide	NIA
-	i I	1 =0 8 1 1 11	CIMETIDINE (Tagament)	10 mg 200
-88 C	rown Cork & Seel, Inc - Grolina	20 43	Capsulas vacias de gel	NIA
90	TKEPA, Aquitre	1 1 1	WTP sludge	NIX
88 Li	te Savers - Las Piedras	13273	WTP Sludge	NIA
દર	Dr PA, Aguille	H DM	glicerine + licasyne	NIM
		15443	WTP Sludge	NIA
	on Hagnetics Caribe Hora	136P	Consider Song Nos	0000
	7/14/88	1642 P	11 to 1 - 11 1 1 1 1 1	ries
	, 11	1640 P		0001
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8/26/88 Galmers 60 y3 (Sport tan) 8/5/88 Enformilie Magnetic 2 change genel Strangfaired Septemb 88' 9/1/88 yaluces 3573 (Spent fam) (13 Shipme of 7-006) 204 9/3/88 Segret 11 3/5/88 " (3 Shipments) 1. 55 fel Dool 36 f fel Dool 2007 9/13/88 IO/AL Dos 55gel Dool 9/14/88 Digital 207 700 6 5/5/82 0 " 664 Doof 5/20/82 VSIP.R. Oct. 88' no . I.w. received Digital 20T 700 C

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12/2/88 Onformilia Magnetic 1800 # Warte
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		Digital Equipment corporation - Sabarra Grande			.00									a.	1. H. de de commo Regnolds, Gaagama	17 471 1 1110	2/21/2018	1		Dry tel agreen a appendion - Schine Grund.		2		The state of the contract of the contract			1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		, ,,	
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Protecto Consent Order Summary

- o Total Number of individual requirements 37
- o Number complied with on time 21
- o Number complied with but late 12
- o Number not complied with 4

COMPLIANCE STATUS

Proteccion Technica Ecologica, Inc. ("PROTECO")

I. Violations

- 1. Consent Decree
 - * Reporting requirement
 - ° Construct on an accelerated schedule by 7/88 the following H.W. management units:

stabilization facilities tank storage and treatment facilities container storage and storm water management facilities

- ° Surface water investigation report
- Remediation report
- 2. Non-Consent Decree
 - ° Financial requirement
 - ° WAP (to comply with Land Ban requirement)
 - o Land Ban requirements (storage of greater than one year and accepting wastes w/o notification)
 - ° Storage of hazardous wastes on a non-designated area
 - ° Exceed the storage capacity as indicated in the Part A

Financial Requirements

- o Liability (property damage/bodily injury to third parties)
 - Sudden 1 million/2 millionNon-Sudden 3 million/6 million
 - insurance, financial test or corporate guarantee
- Closure/post-closure assurance
 - Sufficient to cover cost of closure and post closure monitoring/maintenance (over 3 million)
 - Allowable mechanisms
 - trust fund
 - surety bond
 - letter of credit
 - insurance
 - financial test/corporate test
- o Recent inspection (1/89) indicate Violations of Liability and closure assurance.
- o 3007 letter to be issued 2/89 requesting financial requirement documentation.
- o If response confirms violation, then Consent Order will be modified or administrative enforcement action taken.
- One option is to require compliance at active units now and future units as they come on-line and not at inactive units since closure at inactive units would occur incidental to new construction.

Proteco Action Items

- 1. Status of 3013 order compliance (1/20)
- 2. 1/23-24 EPA inspection findings (2/3)
- 3. approval letters for plans submissions (2/28)
- 4. revisions of Consent Decree (3/15)
 - ° injunctive relief
 - ° specific closure schedule
 - ° meet all interim status requirements in Consent Decree
 - ° removal of references to new facilities
 - ° stipulated penalties
- 5. chronology of communication with Proteco (2/28)
- 6. referral to DOJ (4/15)

PETITION FOR RELIEF

- . Extend construction schedule until 1/90
- . Postpone penality payments until 1/90 (including 2nd payment due 1/1/89)
- Protecto claims existing construction schedule is not a regulatory or statutory requirement
- Petition needed due to delays in getting GDB loan approval (claims "force majeure")
- . Delays, in part, due to GDB condition that Protecto get a partner and Protecto's inability to do so
- . Construction will be completed within 12 months of financing

PROTECO

COMPLIANCE MATRIX

Paragraph # ; of ; Consent Decree!	Regulation	Violation Description	 Effective Date	: Status
1 & 2	265, 197 265, 228 265, 280 265, 310	Closure plans/post closure plans	1/30/88	Under review
3	265, 330 265, 229 265, 314 265, 262 265, 281	Disposal of hazardous waste in lanfills, surface impoundments and drums buried units	12/28/87	In compliance
4	265.93	GW Quality Assessment program outline	1/30/88	Under review
5	CD	Hydrogeological Investigation (H.I.) Report	1/30/88	Approved, however Further site charac. needed
5	CD	Soil Investigation and Surface Water Investigation Report		Not in compliance surface water investigation not complete
6	CD	6.W. Monitoring Program and Schedule		Not in compliance Not submitted
7	265.91 ; 265.92 ;	6.W. Sampling & Monitoring Plan	12/28/87	Under review

	ř			
8	265.13	W.A.P.	1/30/88	 Land-ban revisions required
9	265.15	 Inspection Plan & Schedule	1/30/88	! In compliance; approval needed
10	265.16	Training Plan	1/30/88	! ! In compliance; ! approval needed
11	CD	Cease placement of hazardous waste in units	12/28/87	: ! In compliance
12	CD	Soil Contamination report	1/30/88	: : In compliance
13	; CD ;	Remediation report pursuant to Para. 5	30 days after approval of H.I. report	Not in compliance; not submitted
14	265.17 265.31 Rule I 809 Rule I 812 B (3)		12/28/87	Dut of compliance as of 9/1/88 EQB inspections
15 & 16	265.17	"NO SMOKING" sign, precautions of ignitable or reactive waste	12/28/87	In compliance
17	CD	Repair of water storage tank	1/30/88	In compliance
18	265.32	Fire control equipment	1/30/88	In compliance; approval needed
19 & 20	265.232	Obtain decontamination equipment, provide locations in plan	1/30/88	In compliance; approval needed
	2.			

		A		
21 & 22	265.32 265.34	Install and provide interal communication and alarm system	12/28/87	In compliance; approval needed
23	265.33	Maintain communication systms, fire, and decontamination equipment	12/28/87	 In <mark>com</mark> pliance
24	265.35	 Adequate aisle space 	12/28/87	In compliance
25	CD	Submit container storage area upgrade plan	1/15/88	: Under review
26	265.37	Emergency arrangement	12/28/87	: In compliance
27	265.51 265.52 thru .56	Contigency Plans		Need revision per 9/1/88 EQB Inspection
28	265,72	Manifest discrepancies	12/28/87	In compliance
29	265.73	Dperating log	1/15/88	In compliance
30	265.77	Reporting requirement	12/28/87	Not in compliance
31	Rule I 812 B(1)		Upon approval of upgrade plan	Upgrade plan not approved yet
32	265.171	Management of containers	After approval of mgmt. plan	Approval of plan not given
33	Rule I 812 C	Managemnt plan to manage existing drums	1/15/88	In compliance; approval needed
	I.			

34	Rule I B12 C	 Manage drums as a hazardous solid waste -	12/28/87	In compliance
35	265.194	Inspection of tank	12/28/87	In compliance
36	265,222	Maintain free board	12/28/87	 In compliance

37 Shall construct on an accelerated schedule by 7/88 the following units:

stabilization facilities tank storage & treatment facilities container storage and storm water management facilites

not in compliance

Filename : Proteco : PC015 DR 0



February 6, 1990

Mr. Joel Golumbek
Chief
NJ/Caribean Office
Compliance and Enforcement
Section
US EPA Region II
26 Federal Plaza
New York, N. Y. 10278

Dear Mr. Golumbek:

The Compliance Evaluation Inspection report for Protección Técnica Ecológica is included for your review. Your comments will be appreciated.

If you need further assistance regarding this matter, please contact me at (809) 767-8031.

cordially,

Director

Land Pollution Control

Area

PMB/sec

Enclosure

MEMORANDUM

TO

Mrs. Flor L. Del Ver

Director

Land Pollution Control

hrea

THROUGH :

Mr. Carlos R. Martinez

Acting Director

Hazardous Waste Division

1

:

Mr. Carmelo Vázquez

acting Chief

Inspection, Monitoring and

Surveillance Section

FROM

Priscilla M. Bestard

Environmental Specialist

SUBJECT :

Protección Técnica Ecológica

(PROTE CO)

Penuelas, Puerto Rico

PRD 091018622

The above mentioned facility was visited on December 26, 1989. During the visit a Compliance Evaluation Inspection for a TED facility was performed.

Attached, please find the following documents in regard to this inspection:

- Inspection Report
- Inspection Checklist
- Land Ban Inspection Checklist
- Referral to EPA

A copy of this report will be submitted to EPA Region II, since this facility is under their enforcement action.

/seq

SUMMARY OF FINDINGS

Protection Tecnica Ecologica (PROTECO) is a commercial TED Facility located at Penuclas, Puerto Rico. On December 26, 1989, the facility was visited in order to perform a Compliance Evaluation Inspection. During the visit I met with Mr. René Rodríguez, Compliance Manager of the facility.

The wastes managed at PROTECO are received from Generators in the Island of Puerto Rico. There are units to handle hazardous and non - hazardous wastes. The hazardous waste is managed in the following units: containers storage area, tank storage area, containers landfill, neutralization impoundments, oil lagoon and land treatment area. At the moment of the inspection, the only active unit was the containers storage area. All other units are inactive as a result of an agreement with EPA and EQB, for those units PROTECO will have to submit Closure plans to comply with a Consent Decree granted by the US Department of Justice. (United States V. Proteco Inc. et. al. - Civil Action 86-1698).

The amount of 741 drums of hazardous wastes were stored at the container storage area. All the containers were labeled and segregated by waste type. Incompatibles wastes were segregated by means of an earth dike and the drums are stored over palets. An upgraded container storage area was required in EPA's Consent Decree, however at the time of the inspection, it was observed that this requirement has not been fullfilled.

In relation to the other RCRA units, it was observed that the corrosive lagoon was partially dry and comply with the two feet freeboard. The oil lagoon also complies with the free-board. The rain water basin was completely dry and the land treatment areas were found full of weeds. The lindans tank was empty and surrounded by weeds. All of these units are inactive.

On April 28, 1989, a Notice of Deficiency was issued by the EPA, with specific Part B, Closure Plan and ground water monitoring deficiencies, for which PROTECO have to respond in an specified timeframe. Mr. Rodriguez told us that he is still working in the documents that will be submitted as a response of the NOD.

During the inspection, we found that the facility was not complying with the provisions of the Regulation for the Control of Hazardous and Non - Hazardous Solid Wastes (RCHNHSW)

and also with the 40 Code of Pederal Regulations. Please see the attached list of violations.

Regarding Land Disposal Restrictions requirements (49 CFR Part 268), we found that PROTECO stores containers with Land Banned Wastes for more than one year without having any proof that the accumulation is necessary to facilitate proper recovery, treatment or disposal. This is a violation of 40 CFR

PNB/sec

PROTECCION TECNICA ECOLOGICA LIST OF VIOLATIONS

- 1) Rule 812 B (1) of RCHNHSW states that the hazardous waste facility that stores containers of hazardous wastes must have a continuous base which is impervious to the stored waste. At the time of the inspection, the container were stored over pallets directly over the soil.
- 2) 40 CPR Part 265.191 requires an owner or operator of a hazardous waste facility that operates an existing tank system that does not have secondary containment system meeting the requirements of 265.193 to obtain and keep on file a written assessment reviewed and certified by an independent professional engineer that attends to the tank system's integrity by January 12, 1988.

At the time of the inspection such document was not available at the facility.

3) 46 CFR Part 265.13 requires that the facility's Waste Analysis Plan be revised to include the test required to be performed to the waste subject to Land Disposal Restrictions and the frequency of those testings.

At the time of the inspection it was found that the WAP has not been revised to include these requirements.

4) 40 CFR 268.50 requires that an owner or operator of a hazardous waste facility may store such wastes beyond one year however, the owner/operator bears the burden of proving that such storage was solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment or disposal.

At the time of the inspection, PROTECO'S personnel did not have any proof or any document to comply with this requirement.

PMB/sec

February 6, 1990

Mr. Joal Golumbek Chief NJ/Caribean Office Compliance and Enforcement Section US EPA Region II 26 Federal Plaza New York, M. Y. 19278

Dear Mr. Golumbek:

The Compliance Evaluation Inspection report for Protección Técnica Ecológica is included for your review. Your comments will be appreciated.

If you need further assistance regarding this matter, please contact me at (809) 767-8031.

cordially,

Director

Land Pollution Contro.

Area

PHB/sec

HAZARDOUS WASTE CHECKLIST HAZARDOUS WASTE FACILITY STANDARDS

Copy of Report sent to: Facility V EPA Region II
Facility Name: Protection Tecnica Ecologica Inc.
Local Address: Road 385 Km 3 Tallabou Ward, Pinvelas
Postal Address Fitm Delivery
Ponce zip code 00731
Telephone Number 836 - 2058
E.P.A. ID # PRD 09/018622
Date of Inspection: December 26, 1989
Time In:Time Out:
Photos Taken: // YES // NO
If yes, how many?
Samples Taken: // YES // NO No. of Samples
Participating Personnel
E.Q.B. or E.P.A. Personnel: Principle M. Bestard
Mayra Fortes
Facility Personnel: René Rudriquez, Compliance Manager
Report Prepared by: (Name) Paralle you Bostonel
Agency: EQB
Telephone Number: (807) 767-8031
Approved for the Director by:
/ana

265.13 (a) / 807 I - Waste Analysis YES NO N/A 1) Company maintains a detailed chemical and physical analysis of a representative sample of the waste or each waste. 265.13(b)/ 807 I (5) Waste Analysis Plan 1) Company maintains a written Waste Analysis Plan (WAP) at the facility. 2) WAP contains the following: a) Proper parameters Specify:____ b) Proper test methods Specify: c) Proper sampling methods Specify: d) Review or Repeat analysis Frequency: 265.13 (b)(5)/ 807 I 6 For off-site facilities 1) Does the hazardous waste come to this facility from an outside source?. If yes, list the name(s) of generators.

2) The WAP contain the waste analysis that hazardous waste generators have agreed to	
3) Are there procedures in the WAP to insure accompanying manifest?	
✓	
4) WAP describes procedures used to determine the identity of each shipment.	
5) Sampling method used to obtain representative sample of the waste to be identified.	***
omments: The app complies with the requirements	
	; .
265.14/ 803D Security	
1) The facility has	9
1) The facility has: a) 24 hour surveillance system	-
1) The facility has: a) 24 hour surveillance system b) artificial or natural barrier c) Signs with the legend "Danger - Unauthorized Personnel Keep Out" and	-
1) The facility has: a) 24 hour surveillance system b) artificial or natural barrier c) Signs with the legend "Danger - Unauthorized Personnel Keep Out" and "Peligro - Prohibido el paso de personal no autorizado" posted at each entrance to the facility.	-
1) The facility has: a) 24 hour surveillance system b) artificial or natural barrier c) Signs with the legend "Danger - Unauthorized Personnel Keep Out" and "Peligro - Prohibido el paso de personal no autorizado" posted at each entrance to the facility. d) Sign at main entrance of facility	
1) The facility has: a) 24 hour surveillance system b) artificial or natural barrier c) Signs with the legend "Danger - Unauthorized Personnel Keep Out" and "Peligro - Prohibido el paso de personal no autorizado" posted at each entrance to the facility.	

265.15(a) / 803-F General Inspection Requirem	ents		
1) Has the owner or operator developed and follow a written schedule of inspections?	YES	NO	N/1
a) monitoring equipment	V		-
b) safety equipment	_/	<u> </u>	-
c) emergency equipment	_/		
d) security devices	¥,		
e) operations and struct equip.		84: <u> </u>	
Written inspection schedule (Plan) is kept at the facility.	_/		
3) The schedule identifies:			
 a) types of problems to be looked for during the inspection 	\angle		
b) frequency of inspection:	~		
4) Does the owner/operator record inspection in a log?	ns		
 Records are kept for at least three years from the date of inspection. 	~		
6) Inspection log includes:			
a) date of inspection	~		
b) time		_	
c) name of the inspector	~		
d) observations made			

	YES	NO
e) date and nature of remedial action	ons 🗸	
Comments:		
Comments:		
3		
265.16/R 808 - Personnel Training Record	ls.	
 Facility personnel have successfully completed a program of training since si 	×	
months after the date of their employmen		880
2) Program directed by a person trained	3	
in hazardous waste management procedures		
3) Records of Training:		
a) Job title for each position		
b) Name of employee filling each job		
c) Job descriptions for each position	-	
d) Description of the type and amount		
of both introductory and continuin training	g	
Consider the control of the co	nnel	
 Program designed to ensure that perso are able to respond to emergencies 		
5) Training records on all current emplo	ees	
are kept until closure and for former		
employees are kept for at least three (3) years.		
El Annual routo:		
5) Annual review		

	5.17/Rule 809 General Requirements for Ign compatible Wastes	itable,	Reactive	or
30 19	The second section of the second section of the second section of the second section of the second section sec	YES	NO	N/A
1)	HW handled at the facility are ignitable incompatible, and reactive			
2)	"No Smoking" signs are placed conspicuosly:	\angle	-	-
3)	Separation from sources of ignition or reaction is provided (Regs. state more than 50 feet)	~	e :	
4)	Confinement of smoking and open flame to specially designated locations is established. (Check "No Smoking Signs")			
5)	Management to avoid production of vapors, heats, pressure, etc.			
	Comments:			
Su	bpart C - 265.30/R 810 - Preparedness and I	reventi	on	
1)	Required Equipment:			
	a) Internal comm/alarm system	<u> </u>		
	b) Telephone/2 way radio	1	-	
	c) Portable Fire Control Equipment	_/	-	

		YES	NO	N/A
	e) Spill Control and decontamination equipment	1		_
	2) Equipment Test Result	\checkmark		
	3) Access to comm/alarm system:	V		
	4) Adequate Aisle Space	\angle		
*	5) Local Authorities Arrangements (Evidence)	\checkmark		
	COMMENTS:	S#6		
	Grangements with local authoritie	- havy	rut.	hean
	updated since 1987. a meeting wil	14-	held a	1_
	PROTECO to review the Contingence	y Plan		
	Subpart D 265.50/R 207-Contingency Plan (CP) a Procedures	nd Emerg	ency	
	1) Plan keep on site	<u> </u>		:);
	2) Content of Plan:			
	 a) Description of actions the fac. personnel shall take in response to emergencies 			
	b) Local Authority Arrangements	<u></u>		
	 c) List names, addresses, and phone numbers of all persons qualified to act as emergency coordinator 	_		
	d) List of emergency equipment, including location and physical description	V		
	e) Evacuation Plan (signals to be used to begin evacuation, evacuation routes			_

	YES	NO	N/A
3. CP has been submitted to local authorities	1		
4. CP has been amended	V		
COMMENTS:			
Ontinone Dlan use band again	to Ma		
Continguey Plan was found accep	ravie	•	
Subpart B - 265.71/504 D (1) - Manifest system off-site facilities only)	Operat	ion (fo	or
1) Operator sign, date, and retain copy of each manifest that accompanies each shipment onto the site			-
2) Has the operator found discrepancies in manifest and waste loads?	V	-	
3) Appropriate actions were taken by the off-site facility to reconcile the discrepancy with the waste generator or transporter			
4) The operator accept wastes at the facility that were not accompanied by a manifest.		1	-
5) Appropriate actions were taken by the operator to obtain information on the generator who sent the waste and to provide documents to the regulatory agency.	V		-
Comments: (Viriginary complies with this sect	5.2.		

265.73/ 502 C Operating Record	YES	NO	N/A
1) The operator maintain a written operating record at the facility.	V		201 0 005
2) This record includes:			
a) description of the waste	~		
b) quantity	~	_	
c) method of treatment, storage or disposal	~	_	
d) date of treatment, storage or disposal	2		
e) location of the waste	V	-	
f) final disposition of all wastes	_	-	
g) records and results of waste analysis	V	-	_
n) records and results of inspections	~	-	
i) closure cost estimates and post closure	V		
Comments: They are inclinated in the	_		
- THE TWG NEWSON	_		
forma a	cepta	He.	_
			-
262 20/2			-
262.20/703 - Manifest Requirements			-
1) Describe the approximate size of an average shipment made on a monthly basis:			

2) Check the most recent manifest, for:				
	YES	NO	N/A	
a) Generator's ID number				
b) Document Number				
c) Generator's address and phone number	_			
d) Transpoter's name and ID number	/			
e) Date of shipment and signature	1			
f) Waste shipping				
g) Waste hazard class (DOT)	1			(×
h) Waste quantity or volume	1			
i) Waste No. EPA	_			
j) Type and number of containers	/		(<u>1000-100</u>	
k) Designated TSD facility	_			
1) Handling code for wastes				
3) Check Emergency Information on Manifests:	37-0- 2 -0-1			
a) Immediate response information	_/			
b) Special handling instructions	/		1-0-1- 2	
c) Emergency contact (phone number)	_			
4) Check for Certification Statement: Signed				
5) Check if exception reports have been submitted to the EPA and EQB covering any shipment made more than thirty days ago				
Comments:				
Manifest submitted by givenators	and t	y PR	0720	
- son ply with this requirement	·		-	

265.74/ 505 E Records	B, C, D Availability, Retent	ion and Disposition
		YES NO
	ds, including plans are avainable times for inspection.	lable
Comments:		36
There of	was an problem to ing.	sect the accord
	/	
265.75/503 A	Biennial Report	4
1) Has the ow	wner/operator submitted the	
1) Has the ow biennial repo	wner/operator submitted the ort by March 1 of each even	<u> </u>
1) Has the ow biennial repo numbered year	wner/operator submitted the ort by March 1 of each even	<u> </u>
1) Has the ow biennial repo numbered year Subpart P - 2	wner/operator submitted the ort by March 1 of each even ?	nitoring
1) Has the own biennial reponumbered year Subpart P - 2	wner/operator submitted the ort by March 1 of each even ? 265.90/ R 804 Groundwater Mon	_/
1) Has the own biennial reponumbered year Subpart P - 2 1) The owner/monitoring place.	wner/operator submitted the ort by March 1 of each even or? 265.90/ R 804 Groundwater Mondoperator has a groundwater lan capable of determining the submitted that the submitted is a submitted that the submitted is a submitted that the submitted is a submitted that the submitted is a submitted that the submitted is a submitted that the submitted is a submitted that the submitted that the submitted that the submitted that the submitted that the submitted that the submitted t	_/
1) Has the own biennial reponumbered year Subpart F - 2 1) The owner/monitoring placility's improved the control of the contr	wner/operator submitted the ort by March 1 of each even ? 265.90/ R 804 Groundwater Monday and the company of the compact on the quality of the	_/
1) Has the own biennial reponumbered year Subpart F - 2 1) The owner/monitoring placility's imground water.	wner/operator submitted the ort by March 1 of each even or? 265.90/ R 804 Groundwater Month of the control of	_/
1) Has the own biennial reponumbered year Subpart F - 2 1) The owner/monitoring placility's imground water.	wner/operator submitted the ort by March 1 of each even or? 265.90/ R 804 Groundwater Month of the control of	_/
1) Has the own biennial reponumbered year Subpart P - 2 1) The owner/monitoring placility's imground water. 2) There are installed at	wher/operator submitted the ort by March 1 of each even or? 265.90/ R 804 Groundwater Mode of Comparison has a groundwater lan capable of determining the operator has quality of the operator on the quality of the operator	_/
1) Has the own biennial reponumbered year Subpart P - 2 1) The owner/monitoring placility's imground water. 2) There are installed at	wner/operator submitted the ort by March 1 of each even or? 265.90/ R 804 Groundwater Month of the control of	_/

YES	NO	N/A
1 6 0	10 ()	N / A

			0 % 623	
5) Groundwater monitoring system is capable of yielding groundwater samples for analysis.	see the	rote or	the previous p	age
6) Monitoring wells are installed hydraulically upgradient. Specify how many and the depth of each.				
Iwell - 22-W-85 ~ 79'				
7) Monitoring wells are installed			45	
hydraulically down gradient. Specify how many and the depth of each	,			
6 wells - $18 - \omega - 85 = 59.5'$ $23 - \omega - 85 - 55'$ $26 - \omega - 85 - 71'$ $28 - \omega - 85 \sim 98'$ $27 - \omega - 85 \sim 45'$ $30 - \omega - 85 \sim 55'$ 8) Owner/operator has a groundwater sampling and analysis plan.		~		
9) The plan include procedures and techniques for:				
a) sample collectionb) sample preservation and shipmenc) analytical proceduresd) chain of custody	t	4		
10) The owner/operator has prepared a outline of a groundwater quality assessment program.	n	_		
Comments:				

	.7	
Subpart G - 265.112/ 805 A - Closure Plan YES	NO	N/A
1) Facility has a written closure plan and keep a copy and its revisions at the facility.		1
2) This plan include: a) description of how and when the facility will be partially closed (if applicable) and ultimately closed.	s ·	
b) maximum extent of the operation which will be unclosed during the life of the facility		1 <u>412-11414</u> 9
c) an estimate of the maximum inventory of wastes in storage or in treatment at any given time during the life of the facility	S 	
d) a description of the steps needed to decontaminate facility equipment		
e) a schedule for final closure		
f) final disposition of all wastes Comments: Last revision was May 1, 1988.	-	
is working in a sew revision.		
(4)		
265.118/ 805 B - Post Closure Plan		
1) Facility has a written post-closure plan kept at the facility		(

		YES	NO	N/A
٠,				
2)	This plan include and identifies:			
	a) Activities which will be carried on			
	after closure and frequency of these			
	activities.			
	b) A description of the planned ground-			
	water monitoring activities			
	c) The integrity of the cap and final			
	cover or other containtment structures			7.
	where applicable.			
	d) Describe the function of the facility			
	monitoring equipment		95	
	e) The name, address and phone number of			
	a person or office to contact about the	-		
	disposal facility during the post-closure			
	period.			
	f) Written estimate of the cost of post-			
	closure of the facility. If yes, what			
	is it?			
Sul	part H - 265.140/R 808 - Financial Require	ments		
1)	Does the owner/operator has submitted the		~	
	umentation required in this section to			
EQE	and/or EPA for evaluation.			
Sub	opart I - 265.170 - 265.177/R 812 - Contain	ers		
1)	Type of Containers used:			
	55 gallers- mital and plastic it	uns		
	~			
-				

²⁾ Condition of Containers

	YES	NO	N/A
a) Leaks		_	
b) Ruptures		_/	
c) Corrosion		/	-
d) Closed (Except on Use)			
e) Impermeable Base	-	\checkmark	
f) Secondary Containment	~		
g) Evident Spills			
h) Heat Pressure		~	-
i) 50 ft. Buffer Zone (Ignitable or Reactive Waste Only)	~		
j) Incompatible Material Segregated in different containers, not placed in unwashed container, artificial barrier)	~	: 8	
k) Labels visible for easy identification	\checkmark		
3) Storage Area Inspected Weekly	\checkmark		
Comments:			
Subpart J - 265.190 - 265.199/R 813 - Tanks 1) Number and size of tanks containing hazard Lindane Fank was empty.		ste:	

2)	dentify the waste treated/stored in each	
	There is only one tank.	It was used to shre
	lindane.	
-		
3) 0	perating Requirements	YES NO N/A
a) Leaks	
b) Ruptures	
) Corrosion	
d) sufficient free board (for uncovered tanks)	·
е) Spill prevention controls (check valve dry discount couplings)	es
f	Overfill prevention control (level sensing devices, automatic feed cut off, etc.)	
(.	ste Analysis/Trial Test Records whenever tank is used to treat or	
	ore HW different from previous waste) nk Inspections-Check logs for:	
a)	Overfill/spill control equipment (waste feed cut-off, by-pass, etc.) at least once each operating day	
b)	Monitoring and Leak Detection Equipment Data (e.g. presssure, temperature) at least once each operating day	
c)	Cathodic protection systems, if present	

	YES	NO	N/A
d) Construction Materials of tank, and surrounding portion to detect errosion or signs of release, at least once each opereation day	1		:
 e) Above ground portions of ground systems to detect corrosion or release at least once each operating day 	1		0
f) Level of waste, at least once each operating day	1		
g) Records of inspection maintained	_/	_0_	
6) Ignitable or reactive waste are stored in such manner which protects them from a source of ignition or reaction			
 a) Maintenance of protective distances, according to National Fire Protection Association 			V
7) Incompatible Wastes are being stored separate from each other.	*		V
8) Tank used to store or treat hazardous waste with no free liquids		∠.	
9) Tank inside a building with impermeable floor	 :	1	
10) Written assessment that attests to the tank system integrity (if secondary system does not meet appropriate requirements)	(1)		
11) Tank used to store or treat F020, F021 F022, F023, F026, and F027	-	_	
12) Tank systems age			
13) Facility age			
14) Secondary containment system requirements:			

		YES	NO	N/A
	a) Constructed of or lined with material compatible with waste	-	V	
	b) Sufficient strengh and thickness		_	
	 c) Placed on a foundation or base capable of providing support 	V		
	d) Provided with a leak detection system which detects problems within 24 hours		~	
	e) Sloped or designed to drain and remove spilled material, etc.		<u> </u>	
15)	Secondary containment systems include:			
	a) liner (external to the tank)		V	
	b) vault			
	c) double-walled tank		_/_	
	d) equivalent device; describe	-	~	
16)	Liner and vault designed to contain 100% of the capacity of the largest tank		V.	
17)	Liner and vault designed to prevent run-on or infiltration of precipitation		V	
18)	External liner free of craks or gaps		~	-
19)	Vault contructed with chemical resistant water stops in place at all joints		<u> </u>	
20)	Vault provided with an interior impermeable coating or lining		V	1

	YES	NO	N/A
21) Double-walled tank protected from corrosion	·	V	
22) Ancillary equipment visually inspected for leaks on a daily basis		\checkmark	
23) Has the owner or operator obtain a variance from EPA		1	

_

Facility Na	me: PROTECC
ID Number:	
Inspector:	Priority Bestund
Date:	26 24, 1989

DRAFT RCRA LAND RESTRICTION TREATMENT, STORAGE, AND DISPOSAL REQUIREMENTS CHECKLIST

I.	FACILITY IDE	ENTIFICATION			
()	note	Jeinica e.	T II	Part II	comme
A.	Facility Nam	Je (NI (a	Lalique	Road 385 B. Street (o	, Km 4 Tallabou
	0 - 1		0	B. Street (o	r other identifier)
C. (Penvela.	<i>y</i>	PR	00.	
• •	,		D. State	E. Zip Code	F. County Name
G. N				*	
u. r	elevant SIC	siness; identi codes	fication of industr	ial and waste manageme	ent operations:
				in the section of the	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
H. E	PA ID	191018622			
	HEROTE CHIRAL NO				
T F	TICA.	Kene Re	Phone Number)	836 -	2058
1. r.	acility Cont	act (Name and	Phone Number)	0,0	
II.A.	For onsi	te facilities.	complete the gener	atom should	
В.				ator checklist	Comments
	General	Facility Stand	ards		
1. 0	General				
a	. Does the	facility			
_	TCLP) on	-site or throu	uct waste analysis gh a commercial lab	(total and	
	_ thr	ough commen	and lates and son	ales fungipuint tests	1
Ь	. Describe	the frequency	of sampling conduc	Japang rens	to muming want
					6
	-19% 6	f dums for e	ad specific waste i	a cach shine t	
		Jules of	and specific waste a	shipment received	
. T	reatment Pac	ilities	T. K.		
a.	. Has the t	reatment facil	ity revised its was		
	and Ly 313	Pren [3/00./([) to meet the room	te irements	
	of §264.1	3 or \$265.13?	Ye	s No*	
	(i) Is	the treatment	facility conducting		
	tes	is for wastes	Specified in Annoual	1 A	
	(1.	e., those pron	101ted wastes subta	nt to	
	(IE	atment standar racts) per 286	ds expressed as was	te	
	2.00	per 200	·/(b)(i)? Ye	s No*	

^{*} A potential violation is indicated

		Handler Name:	
			Comments
4.	Does the handler generate any of the following constituents (i.e., spent nonhalogenated solve result of being used in the process either in or commercial grade?	nte) se s	
	cresols and cresylic acid Yes		
5.	Does the handler generate any of the following constituents (i.e., spent nonhalogenated solver result of being used in the process either in por commercial grade?	110) 00 0	
	toluene methyl ethyl ketone carbon disulfide isobutanol pyridine Yes Yes Yes	No No No	
ing. Ad∎	Are any of the constituents listed in the quest used for their "solvent" properties that is solubilize (dissolve) or mobilize other constit The following questions will be helpful in confithis determination.	to uents?	ř
	(a) Chemical carriers?Yes	No	
	If the answer is yes, list the constituents.		
	(b) Degreasing/cleaning? Yes	No	
	If the answer is yes, list the constituents.		
	(c) Diluents?Yes	No	
	If the answer is yes, list the constituents.		

		Facility Name: ID Number: Inspector: Date:
		Comments
c.	Do operating records track the location, quant and dates that vastes exceeding treatment standentered and were removed from storage [\$264.73 \$265.73]?	dards or
d.	Do operating records agree with container label [\$268.50(a)(2) or \$264.73 or \$265.73]	
e.	Is waste exceeding treatment standards stored to less than 1 year?	
	If yes, can you show that such accumulation is necessary to facilitate proper recovery, treatmor disposal? Yes	ment,
	If yes, state how:	
f.	Vas/is vaste exceeding treatment standards stor for more than one year?	
	If yes, state the owner/operator's proof that s storage was solely for the purposes of accumula of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatmor disposal:	ition no prior was provided
Tre	eatment in Surface Impoundments (§268.4)	
Are for	prohibited wastes placed in surface impoundment treatment?	
	Yes	No PROTECO'S surface
If	no, go to E.	importants rock
imp	the only recognizable "treatment" occurring in toundment either evaporation, dilution, or both 68.4(b) and \$268.3]? Yes*	No PROTECO'S seface importante rousi he invertive before No day Ban reg's become
requ	uirements, and the waste analysis plan to the	No*
Have been	e the minimum technology requirements n met [§268.4(a)(3)]?Yes	No*
а.	If the minimum technology requirements have not been met, has a waiver been granted for that unit(s) [§268.4(a)(3)(iii)]?Yes	No*

		Facility Name:	
		ID Number:	•
		Inspector:	
		Date:	
		Comments	
5.	Have the Subpart P ground-water monitoring require been met [\$268.4(a)(3)]? Yes		
6.	Have representative samples of the sludge and supernatant from the surface impoundment been test separately, acceptably, and in accordance with the sampling frequency and analysis specified in the vanalysis plan and are the results in the operating record for all wastes with treatment standards or prohibition levels [§268.4(a)(2)]? Yes		
7.	Did the hazardous waste residue (sludge or liquid) exceed the treatment standards or prohibition levelYes	ls? _No	
8.	Provide the frequency of analyses conducted on treatment residues:		
	Does the frequency meet the requirements of the vas analysis plan [\$264.13 or \$265.13]?Yes		
9.	Does the operating record adequately document the results of waste analyses performed [\$264.13 or \$265.13]?	_No*	
10.	Have the hazardous waste residues that exceed the treatment standards and/or prohibition levels been removed adequately and on an annual basis [§268.4(a)(2)(ii)]?Yes	_No*	
	a. If answer to 6 is no and supernatant is determined to exceed treatment concentrations, is annual throughput greater than impoundment volume? (note: sludge exceeding treatment standards must be removed) Yes	ıst	
11.	If residues were removed annually, were adequate precautions taken to protect liners and do records indicate that inspections of liner integrity are performed? Yes	_No	
12.	When removed, were residues of restricted wastes managed subsequently in another surface impoundmentYes	? _No	
	a. Were these residues subject to a valid 268.8 certification?Yes	_No*	
13.	When removed, were wastes treated prior to disposalYes	? _No	

a. If yes, are waste residues treated on or offsite?

b. Identify management method	ID Number Inspector Date:
b. Identify management method	Date:
b. Identify management method	
Treatment	
Does the facility operate treatment units (reguexempt) (not including surface impoundments)?Yes	/
If no, go to "F."	
Describe the treatment processes, including exe processes.	mpt
Does the facility treat soft hammered wastes?	No
	
generator's cortification/demonstration [\$268.8(c)(1)]?Yes	
. Did the treatment facility certify he treat	
soft hammered waste as per the generator's stration and maintain copies of all certifi	
[268.8(c)(1)]?Yes	
. Did the treatment facility send a copy of t	
generator's demonstration and certification receiving treatment, recovery, or storage f.	
[§268.8(c)(2)]?Yes	(C. M. 100 시간 시간 시간 전)
Does the facility, in accordance with an accept	
vaste analysis plan, verify that the residue ex from all treatment processes for the restricted	
are less than treatment standards or prohibition	n
Levels [\$268.7(c)(2)]?Yes	T2-29-7-13
describe frequency of testing of treatment residence	duals.
as dilution used as a substitute for treatment §268.3]? Yes	

		Facility Name: ID Number: Inspector: Date:
7.	Are all notifications, certifications, and result waste analyses kept in the operating record [\$26 or \$265.73(b)]? Yes	ts of 4.73(b) No*
8.	Are notices provided to land disposal facilities plete with Waste Number, treatment standard, man number, and analytical data (where available) su for each shipment of waste or treatment residual meets the treatment standard stating that waste been treated to treatment performance standards [\$268.7(b)(4) and (5) and \$268.8(c)(1)]?	ifest bmitted
9.	If the vaste or treatment residue will be furthe managed at another storage or treatment facility the treatment facility complied with the 268.7(a notification and certification requirements applito generators [\$268.7(b)(6)]?	r , has
F.	Land Disposal	
1.	Are restricted and/or prohibited wastes placed in disposal units (landfills, surface impoundments piles, wells, land treatment units, salt domes/be mines/caves concrete wault or bunker?) Yes	tveste eds,_
2.	Did facility have the notice and certification fr generators/treaters in its operating record that prohibited wastes disposed met standards for gene or treatment [§§268.7(c)(1); 268.7(a),(b)]? Yes	all
3.	Did the facility obtain waste analysis data throutesting of the waste to determine that the wastes in compliance with the applicable treatment stand [§268.7(c)(2)] Yes	are
	If yes, was the frequency of testing as required facility's waste analysis plan [\$264.13 or \$265.1 Yes	3)?
4.	Were prohibited vastes exceeding the applicable to ment standards or prohibition levels placed in ladisposal units [268.30] excluding national capacitariances [268.30(a)]?	nd ty
	If yes, did facility have an approved valver base no migration petition [268.6] or approved case-by or capacity extension [268.5] or treatment standa variance [268.44][\$268.30(d), \$268.31(d), \$268.32 \$268.33(e)]?	-case rd

		Facility Name: ID Number: Inspector: Date:	
			Comments
5.	Were restricted vastes subject to a national cap variance or case-by-case extension disposed?Yes	acity No	
	If yes, have the minimum technology requirem been met for all units receiving such wastes [\$268.30(c), \$268.31(c), \$268.32(d), \$268.33Yes	(d)]?	
6.	Were adequate records of disposal maintained [§264.73(b) or §265.73(b)]? Yes	No*	
7.	If wastes subject to a nationwide variance, case case extensions [268.5], or no migration petition [268.6] were disposed, does facility have general notices [268.7(a)(3)] and records of disposal? [\$264.73(b) or \$265.73(b)]	ns	
8.	If the facility has a case-by-case extension, car inspector verify that the facility is making progras described in progress reports? Yes	n the gress No	
9.	If the owner/operator is disposing of a soft-hammy waste, is he maintaining the generators and treat (if applicable) notices and certifications [\$268.8(a)(2)-(a)(4)]? Yes	ner ters No*	
	a. Is the facility disposing of any soft hammer that may be classified as California wastes? Yes		
	b. Did the facility seek to verify whether these vastes may be subject to all restrictions, e. California ban? Yes	g., No	

APPENDIX A-1 SOLVENT IDENTIFICATION CHECKLIST

		Handler ID Numb Inspect Date:	er:
		ENDIX A-1 IFICATION CHECKLIST	Xote This waster
1.	Does the handler generate any of the forconstituents (i.e., spent halogenated degreasing) as a result of being used either in pure form or commercial grade	solvents used in	by PROTECO, as
	tetrachloroethylene trichloroethylene methylene chloride 1,1,1-trichloroethane carbon tetrachloride chlorinated fluorocarbons	Yes No Yes No Yes No Yes No Yes No Yes No Yes No Yes No	(W)
2.	Does the handler generate any of the for constituents (i.e., spent halogenated s resul* of being used in the process eit or commercial grade?	solvents) as a	
	tetrachloroethylene trichloroethylene methylene chloride 1,1,1-trichloroethane chlorobenzene trichlorofluoromethane 1,1,2-trichloro-1,2,2-trifluoroethane ortho-dichlorobenzene 1,1,2-trichloroethane	Yes No Yes No Yes No Yes No Yes No Yes No Yes No Yes No Yes No	ngo
3.	Does the handler generate any of the for constituents (i.e., spent nonhalogenated result of being used in the process eith or commercial grade?	d sovlents) as as	
	xylene acetone ethyl acetate ethyl acetate ethyl ether methyl isobutyl ketone n-butyl alcohol cyclohexane methanol	Yes No Yes No Yes No Yes No Yes No Yes No Yes No Yes No Yes No Yes No	
	If the F003 wastestream has been mixed waste, does the resultant mixture exhibiting ignitability characteristic?	vith a solid It theYesNo	

		In the second se	cility Name: Number: spector: te:
			Comments
		(ii) Is the treatment facility using the paint filter test for the California waste resid [§268.7(b)(ii)]? Yes	
		(iii) Is the treatment facility testing the pH o California waste residues? Yes	f No WA
		(iv) Is the treatment facility testing concentr tions (not extracts) in the waste residues for prohibited wastes with established tre- ment standards expressed as waste concentrations [§268.7(b)(3)]?Yes	at-
		(v) Is the treatment facility testing extracts the waste residues for prohibited wastes having established treatment standards expressed as extract concentrations [§268.7(b)(1)] Yes	
3.	Lan	d Disposal Facilities	
	a.	Has the facility retained all notices and certifications from generators, storage and treatment facilities [268.7(c)(1)]? Yes	Col pusces 1. C. P. C. S.
	ь.	Are wastes and waste residues tested for compliant with applicable treatment standards and prohibitions [\$268.7(c)(2)]? Yes	
	c.	Are they being tested in conformance with the frequency specified in the waste analysis plan [§268.7(c)(3)] YesN	lo*
	d.	Are the appropriate tests (TCLP vs. total waste) being used [§268.7(c)(2)]?YesN	o*
c.	Sto	rage (\$268.50)	
1.	а.	Are restricted vastes exceeding treatment standar stored (excepting vastes subject to no migration exemptions, nationwide variances, case by case extensions, soft-hammered wastes)? Yes N	
		If no, go to "c."	
	b.	Are all containers clearly marked to identify content and date(s) entering storage [§268.50(a)(2)]? YesN	o*

^{*} A potential violation is indicated

		Handler Name: ID Number: Inspector: Date:	
(d) Extractants?	Yes	No	Comments
If the answer is yes, list the	constituents.		
(e) Fabric scouring?	Yes	/No	

If the answer is yes, list the constituents.

(f) Reaction and synthesis media? Yes No

If the answer is yes, list the constituents.

If questions 1-6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

- 7. Are any of the above constituents spent solvents? A solvent is considered "spent" when it has been used and is no longer used without being regenerated, reclaimed, or otherwise reprocessed.
 Yes No
- 8. If the waste is a mixture of constituents as determined in questions 1-6, answer this to determine whether it is a "solvent mixture" covered by the listings.

If the wastestream is mixed and contains more than one of the F001-F005 constituents listed in questions 1-5 (by volume), give the concentration before use of <u>all</u> the constituents in the solvent mixture/blend. For example:

5% methylene chloride 2% trichloroethylene 25% 1,1,1-trichloroethane 68% mineral spirits 100%

If the wastestream is a mixture containing a total of 10% or more by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

Bandler	Name:	
ID Numbe	rı	
Inspecto	or:	
Date:		

With respect to the POO3 solvent vastes, if, before use, the vastestream is mixed and contains only FOO3 constituents, it is a listed waste. For example:

33% acetone 16% methanol 51% ethyl ether

If in light of the above, the handler appears to be generating FOO1-FOO5 hazardous wastes, refer this facility to the enforcement official for follow-up actions verifying the use of solvents at the facility.

The following violations were found at Proteco.

40 CFR 270.71, 40 CFR 270.72, RCHNHSW Rule 915 and Rule 916C. (I.S. requirements)

During the period of 9/88 - 1/89, Proteco accepted 32 trailer trucks of contaminated soil with F006 weight approx. 640 tons (manifests attached exhibit #1). At the time of the inspection, all except one trailer were shipped out. Out of 32 trailer trucks, 28 stored greater than 10 days (21 did not have Chem. Waste Mgnt. manifest) and the remaining four shipped out within 10 days. As indicated by the EQB inspection of 9/1 - 2/88 (report attached, exhibit #2) 9 trailers were stored in a non-designated storage area. Based on the updated Part A application (exhibit #3), Proteco is permitted to store up to 1,000 drums at the storage area. With the contaminated soil from Digital and approx. 734 drums of other hazardous waste, Proteco has far exceeded the storage capacity permitted under the Part A application. Therefore, Proteco is in violations of 270.71, 270.72, Rule 915 and Rule 916C requirements.

40 CFR 265.13 (Waste Analysis)

- o On 8/5/88 and 12/20/88, Proteco accepted drums of transformer oil from Information Magnetic without testing for PCB (manifests # 8803 and 3.88, WPS p1769)
- o On 12/28/88 Proteco accepted hazardous waste generated by Rido Construction without determining whether it matches the identity of the waste specified on the accompanying manifest or shipping paper.
- o None of the solvents or other restricted waste accepted by Proteco was tested per 265.13 and 268.7 requirements.

Based on our findings, the procedures used to inspect and analyze each shipment of hazardous waste do not ensure that the waste matches the identity of the waste designated on the accompanying manifest. The instituted procedures only indicate testings of characteristic of ignitability and corrosivity (pH). Proteco is, therefore, in violation of the 265.13(a) requirements in that it does not determine the identity of manifested listed waste or manifested EP - toxic waste.

265.16 (Personnel training)

At the time of the inspection, Mr. Rene R. Rodriguez, Compliance Manager, indicated that he will be attending seminars/courses in March or April in DOT requirements and RCRA related courses. It is clearly stated in 40 CFR 265.16(a)(2) that a training program must be directed by a person trained in hazardous waste management procedures. Mr. Rodriguez did not have any previous required training (he could not identify any relevant courses taken) and, therefore, does not meet this requirement.

40 CFR 265.50 (Contingency Plan)

The contingency plan must be amended to include the new emergency coordinator. This was not done.

40 CFR 265.177(c) (Incompatible Waste)

One drum of oxidizing material was found in a storage bay containing F001 and F002 waste. There was no dike or berm to segregate the drums in the event of a leak. As per 40 CFR Part 265, Appendix V - Examples of Potentially Incompatible Waste, strong oxidizers must be segregated from solvents. This practice or procedure of storage of incompatible waste is an unacceptable management procedure and, therefore, is in violation of 40 CFR 265.177. The drum was generated from Saint John School, 1454-66 Ashford Ave, dated 9/7/86, and was labeled D002 and stated oxidizing material.

40 CFR 265.77 (reporting)

Sampling data indicated there is a release from the oil lagoon into the groundwater. Proteco failed to report such release to the regulatory agencies. This also is required under the Consent Decree.

40 CFR 268.7 (Waste Analysis)

Proteco needs to revise its Waste Analysis Plan to include the testing methods under 40 CFR 268.7.

40 CFR 286.7(c) (Notification)

Proteco accepted restricted waste subject to land disposal restrictions rule without meeting the notification requirements.

40 CFR 265.73 (Operating Record)

53 Fed. Reg. 31211 (August 17,1988), clearly stated that for an off-site storage facility, a copy of the notice, and the certification and demonstration if applicable, required by the generator or the owner of operator under 268.7 or 268.8 be kept on file. At the time of the inspection, Proteco failed to retain all the manifests and notification/certification required by Digital under 40 CFR 268.

40 CFR 268.50 (Prohibitions on Storage)

Since Nov. 7, 1986, Proteco has been accepting hazardous wastes subject to land disposal restriction rule. At the time of the inspection, Proteco stored restricted waste for greater than one year. Storage for greater than one year is allowed if the storage is needed to ensure proper treatment recovery or disposal. Such treatment, recovery or disposal is not available

at Proteco. Therefore, storage for greater than one year is not necessary. Proteco is in violation of 40 CFR 268.50(c). (see exhibit #6, hazardous waste inventory)

40 CFR 265 Subpart H (Financial Requirements)

Liability Requirements

Proteco indicated in its Part B permit application an insurance policy issued by Natural Insurance Co. effective thru 4/6/86 for a liability coverage of \$1 million. At the time of the inspection, Proteco provided a copy of the certificate of insurance (exhibit #4). As of 2/7/89 (see attached letter, exhibit #5), Proteco was still seeking the necessary insurance to cover nonsudden accidental occurrence. A copy of a second Certificate of Insurance was also provided on 2/7/89 for apparently the same policy as the certificate in exhibit 4. On April 16, 1982, EPA promulgated regulations requiring owners or operators to demonstrate liability coverage during the operating life of the facility for bodily injury and/or property damages to third parties resulting from accidental occurrences arising from facility operations. Under 40 CFR 265.147, an owner or operator of a hazardous waste treatment, storage, or disposal facility must demonstrate, on a per-firm basis, liability coverage for sudden accidental occurrences in the amount of \$1 million per occurrence and \$2 million annual aggregate, exclusive of legal defense costs. Certificate of Insurance, dated 1/31/89, indicated the comprehensive general liability coverage for bodily injury and property damage is \$1 million each occurrence and \$1 million aggregate. Furthermore, the Certificate of Insurance submitted by Arieta & Combas Insurance Agency, Inc. does not meet the requirements of 265.147(a)(1)(i). Therefore, based on the above, Proteco is not meeting the requirements of 40 CFR 265.147(a) and (b).

Financial Assurance

With respect to closure cost estimates at existing units, Proteco has submitted estimates of closure costs of \$3 million. Based on our review, the closure estimate should be approximately \$24 million. Proteco should revise costs more in line with EPA's estimate. If Proteco has established an Irrevocable Letter of Credit and Standby Trust Fund Agreement for the closure of all existing facilities in an amount of \$3 million, it would be inadequate. Therefore, Proteco is in violations of 40 CFR 265.143 requirement.

Violations of the Consent Decree

Proteco fails to meet the following conditions of the Consent Decree:

1) Reporting requirement (as mentioned above)

2) Construct in an accelerated schedule by 7/88 the following hazardous waste management units.

Stabilization Facilities
Tank Storage and Treatment Facilities
Container Storage and Storm Water Management Facilities

3) Surface water investigation report has not yet been submitted.

Recommendation

Following recommendation:

- o issue enforcement action against Proteco
- o require Proteco to submit a copy of the insurance policy and to clarify as to whether the policy covers liability resulting from sudden accidental occurrence arising from operations at Proteco, including Hazardous Waste operations.

SHIPMENTS OF FOO6 RECEIVED BY PROTECO

During the period of 8/88 - 1/89, Proteco accepted 33 trailer trucks of contamained soil with F006 weight approx. 660 tons (manifests attached). The shipments (each weight approx. 20 tons) are as follows:

Manifest #	Date Received	Date Shipped Off Site
88244	09/03/88	09/15/88
88245	09/03/88	09/21/88
88246	09/03/88	09/15/88
88247	09/03/88	09/15/88
88248	09/03/88	09/19/88
88249	09/03/88	09/21/88
88250	09/03/88	09/27/88
88251	09/03/88	09/21/88
88252	09/03/88	09/27/88
88253	09/03/88	10/14/88
88254	09/03/88	09/27/88
88255	09/03/88	10/06/88
88256	09/03/88	10/24/88
88257	09/03/88	09/28/88
88258	09/03/88	09/06/88
88259	09/07/88	10/06/88
88260	08/07/88	10/07/88
88261	09/04/88	10/24/88
88262	09/08/88	10/15/88
88263	09/08/88	10/17/88
88264	09/08/88	10/14/88
88265	09/19/88	10/24/88
88266	11/30/88	<u>-</u>
88267	11/29/88	01/20/89
88268	12/01/88	01/11/89
88269	12/01/88	01/12/89
88270	12/01/88	01/12/89
88271	12/02/88	12/13/88
88272	12/02/88	12/13/88
88273	12/02/88	12/13/88
88274	12/02/88	01/20/89
88275	12/02/88	01/12/89
88276	12/02/88	01/20/89



